

EXHIBIT A

**IN THE UNITED STATES DISTRICT
COURT FOR THE WESTERN DISTRICT
OF TEXAS SAN ANTONIO DIVISION**

**UNITED STATES OF AMERICA ex rel.
TIFFANY MONTCRIEFF, ROBERTA
MARTINEZ, and ALICIA BURNETT,**

Plaintiffs,

vs.

**PERIPHERAL VASCULAR
ASSOCIATES P.A.,**

Defendant.

Civil Action No. SA-17-CV-00317-XR

JOINT EXHIBIT LIST WITH OBJECTIONS

Relators' Trial Exhibit List						
Exhibit No.	Date	Description	Bates Range	Defendant's Objections	Adm.	Den.
1.	6/5/2020	The Deposition Testimony of Grady D. Alsabrook, M.D.	--	Relevance; Hearsay. Fed. R. Evid. 401, 403, 801, 802.		
2.	6/1/2020	The Deposition Testimony of Barbara Burrow	--	Relevance; Hearsay. Fed. R. Evid. 401, 403, 801, 802.		
3.	6/3/2020	The Deposition Testimony of John Gilpin	--	Relevance; Hearsay. Fed. R. Evid. 401, 403, 801, 802.		
4.	10/10/2019	The Deposition Testimony of Katherine E. Britt pursuant to Relators' 30(b)(6)	--	Relevance; Hearsay. Fed. R. Evid. 401, 403, 801, 802.		
5.	6/4/2020	The Deposition Testimony of Lois A. Fiala, M.D.	--	Relevance; Hearsay. Fed. R. Evid. 401, 403, 801, 802.		
6.	7/22/2020	The Deposition Testimony of Paul E. Collier, M.D.	--	Relevance; Hearsay. Fed. R. Evid. 401, 403, 801, 802.		
7.	7/23/2020	The Deposition Testimony of Melissa Scott, CPC, CHC, CHIAP	--	Relevance; Hearsay. Fed. R. Evid. 401, 403, 801, 802.		
8.	6/2/2020	The Deposition Testimony of Lyssa N. Ochoa, M.D.	--	Relevance; Hearsay. Fed. R. Evid. 401, 403, 801, 802.		

9.	6/3/2020	The Deposition Testimony of Martha McGee	--	Relevance; Hearsay. Fed. R. Evid. 401, 403, 801, 802.		
10.	6/2/2020	The Deposition Testimony of Brian Hembling	--	Relevance; Hearsay. Fed. R. Evid. 401, 403, 801, 802.		
11.	5/24/2012	Email from Monica Garcia to Barbara Burrow, Subject: "RE: Focus reports"	DEF0162496	Relevance; Hearsay; Foundation; Speculation. Fed. R. Evid. 401, 403, 602, 801, 802.		
12.	8/29/2012	Email from Barbara Burrow to Jeffrey Martinez, Subject: "Unsigned reports in focus"	DEF0162835	Relevance; Hearsay; Foundation; Speculation. Fed. R. Evid. 401, 403, 602, 801, 802.		
13.	12/21/2012	Email from Carl Negley to Bellinda Conte, Stephanie Pierce, and Teena Wright, Subject: "Re: PVA-MTBH Final"	DEF0169300 – DEF0169302	Relevance; Hearsay; Foundation; Speculation; Best evidence; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 1002–1004.		
14.	9/5/2013	Email from Barbara Burrow to Kimberley Martin, Subject: "Re: Hondo LAB ONLY"	DEF0164346 – DEF0164348	Relevance; Hearsay; Foundation; Speculation. Fed. R. Evid. 401, 403, 602, 801, 802.		
15.	9/6/2013	Email dated from Daniel Garcia to Barbara Burrow, Subject: "RE: PVA dictations"	DEF0164363 – DEF0164364	Relevance; Hearsay; Foundation; Speculation. Fed. R. Evid. 401, 403, 602, 801, 802.		
16.	9/26/2013	Email from Andrea Salinas-Cervera to Barbara Burrow, Subject: "RE: voucher# 4647550 Basil Gabriel"	DEF0164397 – DEF0164400	Relevance; Hearsay; Foundation; Speculation. Fed. R. Evid. 401, 403, 602, 801, 802.		

17.	2/22/2017	Email from Lyssa Ochoa to Grady D. Alsabrook, Subject: "Re: Inpatient vascular lab testing at Northeast Baptist"	DEF043216	Relevance; Hearsay; Foundation; Speculation. Fed. R. Evid. 401, 403, 602, 801, 802.		
18.	10/7/2019	Email from Barbara Burrow to Kathy Britt, Subject: "Hospital Process"	DEF0181009 – DEF0181010	Relevance; Hearsay; Foundation; Speculation. Fed. R. Evid. 401, 403, 602, 801, 802.		
19.	10/7/2019	Email from Barbara Burrow to Kathy Britt, Subject: "Office Lab Process"	DEF0181011 – DEF0181012	Hearsay; Foundation; Speculation. Fed. R. Evid. 602, 801, 802.		
20.	6/5/2015	Medical Documentation & Coding Compliance Pledge to Peripheral Vascular Associates P.A.'s	DEF000693 – DEF000747	Relevance; unduly prejudicial. Fed. R. Evid. 401, 403.		
21.	9/14/2018	Email from Barbara Burrow to Lois Fiala, Subject: "Vascular Lab Compliance"	DEF0175799 – DEF0175828	Hearsay; Foundation; Speculation. Fed. R. Evid. 602, 801, 802.		
22.	11/6/2017	DT read and study times.xlsx	PVA0236767	Hearsay; Foundation; Speculation; Authenticity. Fed. R. Evid. 602, 801, 802, 901.		
23.	2014	ACR Practice Parameter for Communication of Diagnostic Imaging Findings	ALEXANDER000504 – ALEXANDER000512	Relevance; Hearsay; Foundation; Authenticity. Fed. R. Evid. 401, 403, 602, 801, 802, 901.		
24.	4/21/2015	Juan M. Lopez's Cerebrovascular Duplex Scan	PVA0005264			
25.	7/17/2018	Juan M. Lopez's Account Inquiry	PVA0013205 – PVA0013206			
26.	7/17/2018	Juan M. Lopez's Medical Chart	PVA0005251 – PVA0005259			

27.	--	Excerpt from PVA's website (https://pvasatx.com/about-us/about-pva/)	--	Foundation; Authenticity. Fed. R. Evid. 602, 901.		
28.	4/12/2016	Email from Barbara Burrow to Alicia Burnett, Subject: "Read and testing times"	DEF003021 – DEF003026	Relevance; Hearsay; Foundation; Speculation. Fed. R. Evid. 401, 403, 602, 801, 802.		
29.	6/3/2016	Email from Barbara Burrow to Lois Fiala and Demetrios Macris, Subject: "Current and future lab reports"	DEF022557 – DEF022561	Relevance; Hearsay; Foundation; Speculation; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802.		
30.	2/14/2017	Email from Barbara Burrow to PVA Physicians, Subject: "Reading Studies Update"	DEF039374	Relevance; Hearsay; Foundation; Speculation. Fed. R. Evid. 401, 403, 602, 801, 802.		
31.	5/30/2017	Email from Barbara Burrow to Brian Hembling, Subject: "documents requested," including attachments Vascular Lab Billing Process change.docx, Coding Billing Process.xlsx, DT Sign times.xlsx	DEF007083 – DEF007088	Relevance; Hearsay; Foundation; Speculation. Fed. R. Evid. 401, 403, 602, 801, 802.		
32.	9/10/2017	Email from Brian Hembling to Syed Z. Rizvi, Subject: "Old Minutes etc"	DEF007690 – DEF007713	Relevance; Hearsay; Foundation; Speculation; Authenticity. Fed. R. Evid. 401, 403, 602, 801, 802, 901.		
33.	6/13/2018	Email from Brian Hembling to PVA Physicians, John Gilpin and Barbara Burrow, Subject: "June Vascular Lab Committee Meeting Minutes"	DEF028871 – DEF028884	Relevance; Hearsay; Foundation; Speculation; Authenticity. Fed. R. Evid. 401, 403, 602, 801, 802, 901.		

34.	9/6/2018	Email from Manolito Flores to Barbara Burrow, Subject: "Missing Final Report"	DEF029332	Relevance; Hearsay; Foundation; Speculation. Fed. R. Evid. 401, 403, 602, 801, 802.		
35.	5/30/2019	Email from Randi Balch to Ana Cordovez, Cassandra Shaw, Diana Igna and Wanda Ortiz, Subject: "ICAVL Application review findings"	DEF005825 – DEF005890	Relevance; Hearsay; Foundation; Speculation. Fed. R. Evid. 401, 403, 602, 801, 802.		
36.	5/8/2020	Defendant Peripheral Vascular Associates P.A.'s Objections and Answers to Relators' Interrogatories, Set One	--	Relevance; Hearsay; Foundation; Speculation. Fed. R. Evid. 401, 403, 602, 801, 802.		
37.	3/27/2019	CMS: Medicare Claims Processing Manual Chapter 13 – Radiology Services and Other Diagnostic Procedures	ALEXANDER000421 – ALEXANDER000499	Relevance; Hearsay; Foundation; Speculation; Authenticity. Fed. R. Evid. 401, 403, 602, 801, 802, 901.		
38.	--	Peripheral Vascular Associates P.A.'s Column Header Description	DEF096463 – DEF096465.	Relevance; Hearsay; Foundation; Speculation; Authenticity; Best evidence. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
39.	10/28/2019	Medicare's Local Coverage Determination (LCD): Non-Invasive Cerebrovascular Arterial Studies LCD ID L35397	ALEXANDER000070 – ALEXANDER000083	Relevance; Hearsay; Foundation; Speculation; Authenticity. Fed. R. Evid. 401, 403, 602, 801, 802, 901.		
40.	--	Health Insurance Claim Form Sample 1500	--	Relevance; Hearsay; Foundation; Speculation; Authenticity. Fed. R. Evid. 401, 403, 602, 801, 802, 901.		

41.	1/1/2019	SonoSite Ultrasound Reimbursement information document	--	Relevance; Hearsay; Foundation; Speculation; Authenticity. Fed. R. Evid. 401, 403, 602, 801, 802, 901.		
42.	2019	AIUM Practice Parameter for Documentation of an Ultrasound Examination	ALEXANDER000089 – ALEXANDER000092	Relevance; Hearsay; Foundation; Speculation; Authenticity. Fed. R. Evid. 401, 403, 602, 801, 802, 901.		
43.	--	American Urological Association (AUA), AIUM Medical Documentation Requirements	ALEXANDER000094 – ALEXANDER000100	Relevance; Hearsay; Foundation; Speculation; Authenticity. Fed. R. Evid. 401, 403, 602, 801, 802, 901.		
44.	--	Access Surgery: Surgical and Interventional Ultrasound, Chapter 17, Documentation, Coding, Billing and Compliance	ALEXANDER000417 – ALEXANDER000420	Relevance; Hearsay; Foundation; Speculation; Authenticity. Fed. R. Evid. 401, 403, 602, 801, 802, 901.		
45.	2020	American Medical Association's Current Procedural Terminology (CPT) 2020 Professional Edition code book.	--	Relevance; Hearsay; Foundation; Speculation; Authenticity. Fed. R. Evid. 401, 403, 602, 801, 802, 901.		
46.	--	Philips: Lumify Reimbursement Guide {D0672917.DOCX / 1}	--	Relevance; Hearsay; Foundation; Speculation; Authenticity. Fed. R. Evid. 401, 403, 602, 801, 802, 901. Not identified in discovery or through disclosures.		
47.	--	CMS MLN Matters: Medicare Payments for Diagnostic Radiology Services in Emergency Departments, SE1134 Revised	--	Relevance; Hearsay; Foundation; Speculation; Authenticity. Fed. R. Evid. 401, 403, 602, 801, 802, 901. Not identified in discovery or through disclosures. Exhibit not identified with sufficient particularity.		

48.	--	SPOCUS Reimbursement Statement	--	Relevance; Hearsay; Foundation; Speculation; Authenticity. Fed. R. Evid. 401, 403, 602, 801, 802, 901. Not identified in discovery or through disclosures. Exhibit not identified with sufficient particularity.		
49.	--	IAC Standards and Guidelines for Vascular Testing Accreditation	PVA0015495 – PVA0015559	Relevance; Hearsay; Foundation; Speculation; Authenticity. Fed. R. Evid. 401, 403, 602, 801, 802, 901.		
50.	--	American Urological Association's Ultrasound Documentation Requirements	ALEXANDER001488 – ALEXANDER001493	Relevance; Hearsay; Foundation; Speculation; Authenticity. Fed. R. Evid. 401, 403, 602, 801, 802, 901.		
51.	2017	ACR-SPR-SRU Practice Parameter Performing and Interpreting Diagnostic Ultrasound Examinations	ALEXANDER001570 – ALEXANDER001575	Relevance; Hearsay; Foundation; Speculation; Authenticity. Fed. R. Evid. 401, 403, 602, 801, 802, 901.		
52.	2019	ACR-AIUM-SPR-SRU Practice Parameter for the Performance of Peripheral Venous Ultrasound Examination	ALEXANDER001576 – ALEXANDER001586	Relevance; Hearsay; Foundation; Speculation; Authenticity. Fed. R. Evid. 401, 403, 602, 801, 802, 901.		
53.	--	Compilation of information from PVA's "Testing Only" patient files, Exhibits 74 - 195	--	Relevance; Hearsay; Foundation; Speculation; Improper summary; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 1006.		
54.	--	Compilation of information from PVA's "Testing and Office Visit (E/M)" patient files, Exhibits 56 - 73	--	Relevance; Hearsay; Foundation; Speculation; Improper summary; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 1006.		

55.	2000	American Medical Association's Current Procedural Terminology (CPT) 2000 code book	--	Relevance; Hearsay; Foundation; Speculation; Authenticity. Fed. R. Evid. 401, 403, 602, 801, 802, 901.		
56.	--	PVA records pertaining to patient Petronio B. Antolino, including Account Inquiry, Final Report and Patient Chart	PVA0014201 – PVA0014202; PVA0008247; PVA0008198 – PVA0008239	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
57.	--	PVA records pertaining to patient Rene J. Baeten, including Account Inquiry, Final Report and Patient Chart	PVA0014345 – PVA0014346; PVA0008607; PVA0008585 – PVA0008601	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
58.	--	PVA records pertaining to patient Ricardo G. Camacho, including Account Inquiries, Final Reports and Patient Chart	PVA0014373 – PVA0014374; PVA0014379 – PVA0014380; PVA0008759; PVA0008760; PVA0008694 – PVA0008754	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
59.	--	PVA records pertaining to patient Aurora T. Espinoza, including Account Inquiries, Final Reports and Patient Chart	PVA0011624 – PVA0011625; PVA0011626 – PVA0011627; PVA0000561; PVA0000560; PVA0000567; PVA0000504 – PVA0000553	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
60.	--	PVA records pertaining to patient Domingo G. Pena, Jr., including Account Inquiry, Final Reports and Patient Chart	PVA0012071 – PVA0012073; PVA0001972; PVA0001980; PVA0001991; PVA0001920 – PVA0001968	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		

61.	--	PVA records pertaining to patient Jimmy Vivier, including Account Inquiry, Final Reports and Patient Chart	PVA0012846 -PVA0012847; PVA0004450; PVA0004468; PVA0004278 – PVA0004447	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
62.	--	PVA records pertaining to patient Gloria Alonzo, including Account Inquiry, Final Report and Patient Chart	PVA0012521; PVA0003315; PVA0003305 – PVA0003313	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
63.	--	PVA records pertaining to patient Wayne A. Austin, including Account Inquiry, Final Report and Patient Chart	PVA0015107 – PVA0015108; PVA0011078; PVA0011054 – PVA0011075	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
64.	--	PVA records pertaining to patient Lydia Avalos, including Account Inquiry, Final Report and Patient Chart	PVA0013665; PVA0006512; PVA0006499 – PVA0006510	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
65.	--	PVA records pertaining to patient Frederick R. Baetge, including Account Inquiry, Final Report and Patient Chart	PVA0012382 – PVA0012383; PVA0002892; PVA0002882 – PVA0002890	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
66.	--	PVA records pertaining to patient Rosco D. Baldwin, including Account Inquiry, Final Report and Patient Chart	PVA0014667 – PVA0014668; PVA0009577; PVA0009556 – PVA0009575	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		

67.	--	PVA records pertaining to patient James Q. Barnes, including Account Inquiry, Final Reports and Patient Chart	PVA0012646 – PVA0012649; PVA0003772; PVA0003779; PVA0003785; PVA0003763 – PVA0003769	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
68.	--	PVA records pertaining to patient Anthony A. Baune, including Account Inquiry, Final Report and Patient Chart	PVA0011591 – PVA0011592; PVA0000403; PVA0000392 – PVA0000401	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
69.	--	PVA records pertaining to patient Kenneth Bell, including Account Inquiry, Final Reports and Patient Chart	PVA0013338 – PVA0013340; PVA0005618; PVA0005622; PVA0005645; PVA0005607 – PVA0005616	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
70.	--	PVA records pertaining to patient Luis Blancarte, including Account Inquiry, Final Report and Patient Chart	PVA0013624 – PVA0013625; PVA0006400; PVA0006406; PVA0006382 – PVA0006398	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
71.	--	PVA records pertaining to patient Jake C. Bloom, including Account Inquiry, Final Report and Patient Chart	PVA0012642 – PVA0012643; PVA0003759; PVA0003748 – PVA0003757	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
72.	--	PVA records pertaining to patient Linda A. Boswell, including Account Inquiry, Final Reports and Patient Chart	PVA0013547 – PVA0013548; PVA0006197; PVA0006211; PVA0006158 – PVA0006193	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		

73.	--	PVA records pertaining to patient Consuelo A. Boudreaux, including Account Inquiry, Final Report and Patient Chart	PVA0011930 – PVA0011931; PVA0001546; PVA0001532 – PVA0001542	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
74.	--	PVA records pertaining to patient Patricia A. Boyd, including Account Inquiry, Final Report and Patient Chart	PVA0014144; PVA0007940; PVA0007925 – PVA0007935	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
75.	--	PVA records pertaining to patient Arvin E. Brehn, including Account Inquiry, Final Report and Patient Chart	PVA0011619 – PVA0011620; PVA0000495; PVA0000482 – PVA0000493	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
76.	--	PVA records pertaining to patient Ernestina Campos De Rea, including Account Inquiry, Final Report and Patient Chart	PVA0012283 – PVA0012284; PVA0002481; PVA0002471 – PVA0002475	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
77.	--	PVA records pertaining to patient Dora Cantu Torres, including Account Inquiry, Final Report and Patient Chart	PVA0012093 – PVA0012094; PVA0002032; PVA0002016 – PVA0002030	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
78.	--	PVA records pertaining to patient Felicita Carmona, including Account Inquiry, Final Report and Patient Chart	PVA0012318 – PVA0012319; PVA0002720; PVA0002690 – PVA0002716	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		

79.	--	PVA records pertaining to patient Leaona F. Carter, including Account Inquiry, Final Report and Patient Chart	PVA0013438 – PVA0013439; PVA0005949; PVA0005937 – PVA0005947	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
80.	--	PVA records pertaining to patient Carolina M. Castro, including Account Inquiry, Final Report and Patient Chart	PVA0011838 – PVA0011839; PVA0001312; PVA001300 – PVA0001310	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
81.	--	PVA records pertaining to patient Alan C. Chalfont's, including Account Inquiry, Final Report and Patient Chart	PVA0011458 – PVA0011459; PVA0000088; PVA0000056 – PVA0000084	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
82.	--	PVA records pertaining to patient Bruce D. Chapman, including Account Inquiry, Final Report and Patient Chart	PVA0011797 – PVA0011798; PVA0001106; PVA0001092 – PVA0001104	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
83.	--	PVA records pertaining to patient Katherine N. Chapman, including Account Inquiries, Final Reports and Patient Chart	PVA0013313 – PVA0013314; PVA0013315 – PVA0013316; PVA0005537 – PVA0005538; PVA0005513 – PVA0005534	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
84.	--	PVA records pertaining to patient Marilyn L. Charlton, including Account Inquiry, Final Report and Patient Chart	PVA0013756 – PVA0013757; PVA0006801; PVA0006787 – PVA0006799	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		

85.	--	PVA records pertaining to patient Latheta J. Cole, including Account Inquiry, Final Report and Patient Chart	PVA0013397 – PVA0013398; PVA0005834; PVA0005804 – PVA0005829	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
86.	--	PVA records pertaining to patient Loyce B. Collenback, including Account Inquiry, Final Report and Patient Chart	PVA0013620 – PVA0013621; PVA0006376; PVA0006369 – PVA0006374	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
87.	--	PVA records pertaining to patient Gilbert D. Constancio, including Account Inquiry, Final Report and Patient Chart	PVA0012504 – PVA0012505; PVA0003246; PVA0003216 – PVA0003240	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
88.	--	PVA records pertaining to patient Nancy L. Cook, including Account Inquiry, Final Report and Patient Chart	PVA0014002 – PVA0014003; PVA0007454; PVA0007441 – PVA0007452	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
89.	--	PVA records pertaining to patient Shirley C. Cooper, including Account Inquiry, Final Report and Patient Chart	PVA0014824 -PVA0014825; PVA0009977; PVA0009959 – PVA0009974	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
90.	--	PVA records pertaining to patient Leroy Cranfill, including Account Inquiry, Final Report and Patient Chart, Bates range	PVA0013481 – PVA0013482; PVA0006055; PVA0006036 – PVA0006051	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		

91.	--	PVA records pertaining to patient Bonnie S. Cutts, including Account Inquiry, Final Report and Patient Chart	PVA0011775 – PVA0011776; PVA0001019; PVA0001007 – PVA0001017	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
92.	--	PVA records pertaining to patient Ann F. Depierro, including Account Inquiry, Final Report and Patient Chart	PVA0011572; PVA0000347; PVA0000327 – PVA0000344	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
93.	--	PVA records pertaining to patient Sammie L. Devillier, including Account Inquiry, Final Report and Patient Chart	PVA0014727; PVA0009662; PVA0009651 – PVA0009660	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
94.	--	PVA records pertaining to patient Joseph H. Distefano, including Account Inquiry, Final Report and Patient Chart	PVA0013075; PVA0005063; PVA0005054 – PVA0005061	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
95.	--	PVA records pertaining to patient Olga G. Dominguez, including Account Inquiry, Final Report and Patient Chart	PVA0014087; PVA0007729; PVA0007699 – PVA0007721	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
96.	--	PVA records pertaining to patient Lois A. Durbin, including Account Inquiry, Final Report and Patient Chart	PVA0013590; PVA0006317; PVA0006304 – PVA0006315	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		

97.	--	PVA records pertaining to patient Carl R. Easley, including Account Inquiry, Final Report and Patient Chart	PVA0011821; PVA0001239; PVA0001189 – PVA0001237	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
98.	--	PVA records pertaining to patient Stephen A. Follett, including Account Inquiry, Final Report and Patient Chart	PVA0014904; PVA0010264; PVA0010252 – PVA0010261	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
99.	--	PVA records pertaining to patient Herman C. Folsom, including Account Inquiry, Final Report and Patient Chart	PVA0012594; PVA0003550; PVA0003532 – PVA0003548	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
100.	--	PVA records pertaining to patient Suzanne S. Forrest, including Account Inquiry, Final Report and Patient Chart	PVA0014916; PVA0010327; PVA0010291 – PVA0010325	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
101.	--	PVA records pertaining to patient Ronald G. Frech, including Account Inquiry, Final Report and Patient Chart	PVA0014606; PVA0009402; PVA0009380 – PVA0009399	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
102.	--	PVA records pertaining to patient Martha Funicella, including Account Inquiry, Final Report and Patient Chart	PVA0013760 – PVA0013761; PVA0006820; PVA0006809 – PVA0006817	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		

103.	--	PVA records pertaining to patient Wilbur N. George, including Account Inquiry, Final Report and Patient Chart	PVA 0015130; PVA0011171; PVA0011146 – PVA0011169	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
104.	--	PVA records pertaining to patient Hannalore Godin, including Account Inquiry, Final Report and Patient Chart	PVA0012570 – PVA0012571; PVA0003467; PVA0003449 – PVA0003461	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
105.	--	PVA records pertaining to patient Ann Goetz, including Account Inquiry, Final Report and Patient Chart	PVA0011581; PVA0000363; PVA0000354 – PVA0000361	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
106.	--	PVA records pertaining to patient Jesse Gomez, Jr., including Account Inquiry, Final Report and Patient Chart	PVA0012835 – PVA0012836; PVA0004263; PVA0004249 – PVA0004261	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
107.	--	PVA records pertaining to patient Juanita N. Goodwin, including Account Inquiry, Final Report and Patient Chart	PVA0013237; PVA0005335; PVA0005323 – PVA0005333	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
108.	--	PVA records pertaining to patient Tommy H. Griggs, including Account Inquiry, Final Report and Patient Chart	PVA0015011 – PVA0015012; PVA0010712; PVA0010706 – PVA0010710	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		

109.	--	PVA records pertaining to patient Helen L. Hagle, including Account Inquiry, Final Report and Patient Chart	PVA0012578 – PVA00012579; PVA0003500; PVA0003473 – PVA0003495	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
110.	--	PVA records pertaining to patient Beverly A. Hale, including Account Inquiry, Final Report and Patient Chart	PVA0011709 – PVA0011710; PVA0000801; PVA0000769 – PVA0000796	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
111.	--	PVA records pertaining to patient Ginger M. Hanz, including Account Inquiry, Final Report and Patient Chart	PVA0012511 – PVA0012512; PVA0003264; PVA0003249 – PVA0003262	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
112.	--	PVA records pertaining to patient Caroline C. Heimer, including Account Inquiry, Final Report and Patient Chart	PVA0011845 – PVA0011846; PVA0001330; PVA0001318 – PVA0001328	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
113.	--	PVA records pertaining to patient Gerald W. Heinemeyer, including Account Inquiry, Final Report and Patient Chart	PVA0012484; PVA0003201; PVA0003160 – PVA0003196	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
114.	--	PVA records pertaining to patient Todd D. Hess, including Account Inquiry, Final Report and Patient Chart	PVA0014974 – PVA0014975; PVA0010616; PVA0010602 – PVA0010614	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		

115.	--	PVA records pertaining to patient Elmer Hill, including Account Inquiry, Final Report and Patient Chart	PVA0012204 – PVA0012205; PVA0002274; PVA0002261 – PVA0002272	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
116.	--	PVA records pertaining to patient Reagan Houston, IV, including Account Inquiries, Final Reports and Patient Chart	PVA0014321 – PVA0014324; PVA0008389 – PVA0008390; PVA0008380 – PVA0008386	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
117.	--	PVA records pertaining to patient Dorothy S. Hughes, including Account Inquiry, Final Report and Patient Chart	PVA0012100 – PVA0012101; PVA0002045; PVA0002036 – PVA0002043	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
118.	--	PVA records pertaining to patient Delores L. Hutchens, including Account Inquiry, Final Report and Patient Chart	PVA0012015 – PVA0012016; PVA0001807; PVA0001784 – PVA0001803	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
119.	--	PVA records pertaining to patient Carlson E. Jakubik, including Account Inquiry, Final Report and Patient Chart	PVA0011833 – PVA0011834; PVA0001296; PVA0001278 – PVA0001294	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
120.	--	PVA records pertaining to patient Nelle Jenkins, including Account Inquiry, Final Report and Patient Chart	PVA0014044 – PVA0014045; PVA0007556; PVA0007539 – PVA0007554	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		

121.	--	PVA records pertaining to patient Janet M. Killen, including Account Inquiry, Final Report and Patient Chart	PVA0012759 – PVA0012760; PVA0004030; PVA0004009 – PVA0004027	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
122.	--	PVA records pertaining to patient Lillie M. Lamprecht, including Account Inquiry, Final Report and Patient Chart	PVA0013532 – PVA0013533; PVA0006134; PVA0006120 – PVA0006131	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
123.	--	PVA records pertaining to patient Stella A. Leissner, including Account Inquiry, Final Report and Patient Chart	PVA0014886 – PVA0014887; PVA0010161; PVA0010132 – PVA0010159	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
124.	--	PVA records pertaining to patient Barbara C. Lettunich, including Account Inquiry, Final Report and Patient Chart	PVA0011661 – PVA001162; PVA0000643; PVA0000637 – PVA0000641	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
125.	--	PVA records pertaining to patient Leonardo Lince, including Account Inquiries, Final Reports and Patient Chart	PVA0013444 – PVA0013447; PVA0005966 – PVA0005967; PVA0005955 – PVA0005961	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
126.	--	PVA records pertaining to patient Fred E. Long, including Account Inquiry, Final Reports and Patient Chart	PVA0012370 – PVA0012371; PVA0002857; PVA0002863; PVA0002838 – PVA0002855	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		

127.	--	PVA records pertaining to patient Juan M. Lopez, including Account Inquiry, Final Report and Patient Chart	PVA0013205 – PVA0013206; PVA0005264; PVA0005251 – PVA0005259	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
128.	--	PVA records pertaining to patient Mary J. Lopez, including Account Inquiry, Final Report and Patient Chart	PVA0013913 – PVA0013914; PVA0007136; PVA007106 – PVA0007133	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
129.	--	PVA records pertaining to patient Natalia C. Lozano, including Account Inquiry, Final Report and Patient Chart	PVA0014020 – PVA0014021; PVA0007511; PVA0007492 – PVA0007508	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
130.	--	PVA records pertaining to patient Tommie L. Lucas, including Account Inquiry, Final Report and Patient Chart	PVA0015007 – PVA0015008; PVA0010701; PVA0010686 – PVA0010699	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
131.	--	PVA records pertaining to patient William Lumpkin, including Account Inquiry, Final Report and Patient Chart	PVA0015149 – PVA0015152; PVA0011239 – PVA0011240; PVA0011229 – PVA0011235	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
132.	--	PVA records pertaining to patient Robert Lunz, Jr., including Account Inquiry, Final Report and Patient Chart	PVA0014557 – PVA0014558; PVA0009212; PVA0009206 – PVA0009210	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		

133.	--	PVA records pertaining to patient Eileen Mannion, including Account Inquiry, Final Report and Patient Chart	PVA0012182 – PVA0012183; PVA0002225; PVA0002210 – PVA0002222	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
134.	--	PVA records pertaining to patient Joel J. Marder, including Account Inquiry, Final Report and Patient Chart	PVA0013005 – PVA0013006; PVA0004802; PVA0004789 – PVA0004800	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
135.	--	PVA records pertaining to patient Janice M. Mason, including Account Inquiry, Final Report and Patient Chart	PVA0012778; PVA0004076; PVA0004061 – PVA0004070	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
136.	--	PVA records pertaining to patient Melba L. Maxwell, including Account Inquiry, Final Report and Patient Chart	PVA0013946 – PVA0013947; PVA0007224; PVA0007205 – PVA0007222	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
137.	--	PVA records pertaining to patient Chesley May, including Account Inquiry, Final Report and Patient Chart	PVA0011916; PVA0001500; PVA0001492 – PVA0001496	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
138.	--	PVA records pertaining to patient Dorothy M. McCarley, including Account Inquiry, Final Report and Patient Chart	PVA0012104 – PVA0012105; PVA0002069; PVA0002048 – PVA0002066	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		

139.	--	PVA records pertaining to patient Luis P. Mercado, including Account Inquiries, Final Reports and Patient Chart	PVA0013628 – PVA0013631; PVA0006437 – PVA0006438; PVA0006409 – PVA0006429	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
140.	--	PVA records pertaining to patient Franklin Meyer, including Account Inquiry, Final Report and Patient Chart	PVA0012365 – PVA0012366; PVA0002834; PVA0002821 – PVA0002832	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
141.	--	PVA records pertaining to patient Sandra J. Midcap, including Account Inquiry, Final Report and Patient Chart	PVA0014748 – PVA0014749; PVA0009755; PVA0009744 – PVA0009751	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
142.	--	PVA records pertaining to patient Thomas J. Moon, including Account Inquiries, Final Reports and Patient Chart	PVA00144947 – PVA0014948; PVA0014949 – PVA0014950; PVA0010446; PVA0010447; PVA0010423 – PVA0010443	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
143.	--	PVA records pertaining to patient Corina Musser, including Account Inquiry, Final Report and Patient Chart	PVA0011942 – PVA0011943; PVA0001589; PVA0001567 – PVA0001585	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
144.	--	PVA records pertaining to patient Norma J. Nicholson, including Account Inquiry, Final Report and Patient Chart	PVA0014078 – PVA14077; PVA0007671; PVA0007659 – PVA0007669	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		

145.	--	PVA records pertaining to patient William L. Otten, Jr., including Account Inquiry, Final Report and Patient Chart	PVA0015201 – PVA0015202; PVA0011349; PVA0011338 – PVA0011345	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
146.	--	PVA records pertaining to patient Dorothy J. Overall, including Account Inquiry, Final Report and Patient Chart	PVA0012115 – PVA0012116; PVA0002089; PVA0002076 – PVA0002087	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
147.	--	PVA records pertaining to patient Maurice J. Radtke, including Account Inquiry, Final Report and Patient Chart	PVA0013925 – PVA0013926; PVA0007192; PVA0007180 – PVA0007190	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
148.	--	PVA records pertaining to patient Anita Robles, including Account Inquiry, Final Report and Patient Chart	PVA0011568 – PVA0011569; PVA0000323; PVA0000296 – PVA0000320	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
149.	--	PVA records pertaining to patient Efrain Rodriguez, including Account Inquiry, Final Report and Patient Chart	PVA0012175 – PVA0012176; PVA0002206; PVA0002192 – PVA0002204	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
150.	--	PVA records pertaining to patient Kimberley J. Salisbury, including Account Inquiry, Final Report and Patient Chart	PVA0013371 – PVA0013372; PVA0005783; PVA0005758 – PVA0005780	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		

151.	--	PVA records pertaining to patient Richard S. Saxon, including Account Inquiry, Final Report and Patient Chart	PVA0014461 – PVA0014462; PVA0009012; PVA0008972 – PVA0009004	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
152.	--	PVA records pertaining to patient Robert L. Schlabach, including Account Inquiry, Final Report and Patient Chart	PVA0014572 – PVA0014573; PVA0009273; PVA0009259 – PVA0009271	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
153.	--	PVA records pertaining to patient Wayne Schneider, including Account Inquiry, Final Report and Patient Chart	PVA0015121 – PVA0015122; PVA0011138; PVA0011113 – PVA0011134	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
154.	--	PVA records pertaining to patient Shirley A. Schriewer, including Account Inquiry, Final Report and Patient Chart	PVA0014828 – PVA0014829; PVA0009999; PVA0009984 – PVA0009997	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
155.	--	PVA records pertaining to patient Judith A. Schroeder, including Account Inquiry, Final Report and Patient Chart	PVA0013241 – PVA0013242; PVA0005354; PVA00055341 – PVA0005349	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
156.	--	PVA records pertaining to patient Sandra M. Schwartz, including Account Inquiry, Final Report and Patient Chart	PVA0014754 – PVA00014755; PVA0009782; PVA0009761 – PVA0009778	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		

157.	--	PVA records pertaining to patient Shirley A. Schwarzlose, including Account Inquiry, Final Report and Patient Chart	PVA0014836 – PVA0014837; PVA0010015; PVA0010003 – PVA0010013	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
158.	--	PVA records pertaining to patient Richard R. Smith, including Account Inquiry, Final Report and Patient Chart	PVA0014492 – PVA0014493; PVA0009031; PVA0009025 – PVA0009029	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
159.	--	PVA records pertaining to patient Yvette M. Sommers, including Account Inquiries, Final Reports and Patient Chart	PVA0015224 – PVA0015225; PVA0015222 – PVA0015223; PVA0011432; PVA0011430; PVA0011408 – PVA0011427	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
160.	--	PVA records pertaining to patient Nora Sotelo, including Account Inquiry, Final Report and Patient Chart	PVA0014061; PVA0007626; PVA0007612 – PVA0007623	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
161.	--	PVA records pertaining to patient George W. Stevenson, including Account Inquiry, Final Report and Patient Chart	PVA0012473 – PVA0012474; PVA0003137; PVA0003129 – PVA0003135	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
162.	--	PVA records pertaining to patient Jimmie Swink, including Account Inquiry, Final Report and Patient Chart	PVA0012839 – PVA0012840; PVA0004275; PVA0004269 – PVA0004271	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		

163.	--	PVA records pertaining to patient James L. Swope, including Account Inquiry, Final Report and Patient Chart	PVA0012733; PVA0003971; PVA0003957 – PVA0003969	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
164.	--	PVA records pertaining to patient Carolyn N. Taylor, including Account Inquires, Final Reports and Patient Chart	PVA0011860 – PVA0011861; PVA0011862 – PVA0011863; PVA0001383; PVA0001384; PVA0001351 – PVA0001379	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
165.	--	PVA records pertaining to patient Reyes A. Tello, including Account Inquiry, Final Report and Patient Chart	PVA0014368 – PVA0014369; PVA0008677; PVA0008660 – PVA00008675	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
166.	--	PVA records pertaining to patient Richard P. Thivierge, including Account Inquiry, Final Report and Patient Chart	PVA0014499 – PVA0014500; PVA0009044; PVA0009034 – PVA0009042	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
167.	--	PVA records pertaining to patient Stephana O. Tiller, including Account Inquiry, Final Report and Patient Chart	PVA0014897 – PVA0014898; PVA0010248; PVA0010170 – PVA0010245	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
168.	--	PVA records pertaining to patient Michael C. Timmermann, including Account Inquiry, Final Report and Patient Chart	PVA0013976 – PVA00133977; PVA0007329; PVA0007313 – PVA0007325	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		

169.	--	PVA records pertaining to patient Felix R. Vargas, including Account Inquiry, Final Report and Patient Chart	PVA0012340 – PVA0012341; PVA0002759; PVA0002732 – PVA0002750	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
170.	--	PVA records pertaining to patient Irene Vasquez, including Account Inquiry, Final Report and Patient Chart	PVA0012616 – PVA0012617; PVA0003658; PVA0003601 – PVA0003638	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
171.	--	PVA records pertaining to patient Consuelo F. Villanueva, including Account Inquiry, Final Report and Patient Chart	PVA0011938 – PVA0011939; PVA0001564; PVA0001552 – PVA0001560	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
172.	--	PVA records pertaining to patient Roberto Villareal, including Account Inquiry, Final Report and Patient Chart	PVA0014582 – PVA0014583; PVA0009316; PVA0009302 – PVA0009312	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
173.	--	PVA records pertaining to patient Kenneth A. Walker, including Account Inquiry, Final Report and Patient Chart	PVA0013347 – PVA0013348; PVA0005693; PVA0005676 – PVA0005691	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
174.	--	PVA records pertaining to patient Kerwin P. Weinheimer, including Account Inquiry, Final Report and Patient Chart	PVA0013354; PVA0005728; PVA0005697 – PVA000575	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		

175.	--	PVA records pertaining to patient Alan W. Welch, including Account Inquiry, Final Report and Patient Chart	PVA0011468 – PVA0011469; PVA0000117; PVA0000095 – PVA0000114	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
176.	--	PVA records pertaining to patient Norma I. Wenzel, including Account Inquiry, Final Report and Patient Chart	PVA0014080 – PVA0014081; PVA0007695; PVA0007675 – PVA0007693	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
177.	--	PVA records pertaining to patient Anthony N. White, including Account Inquiries, Final Reports and Patient Chart	PVA0011598 – PVA0011599; PVA0011600; PVA0000434; PVA0000435; PVA0000407 – PVA0000431	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
178.	--	PVA records pertaining to patient Michael L. Whiteside, including Account Inquiry, Final Report and Patient Chart	PVA0013980; PVA0007348; PVA0007333 – PVA0007345	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
179.	--	PVA records pertaining to patient Vern D. Williams, including Account Inquiry, Final Report and Patient Chart	PVA00155015 – PVA0015016; PVA0010722; PVA0010715 – PVA0010720	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
180.	--	PVA records pertaining to patient Vesper B. Wimberley, including Account Inquiry, Final Report and Patient Chart	PVA0015026; PVA0010805; PVA0010790 – PVA0010803	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		

181.	--	PVA records pertaining to patient Linda S. Woodall, including Account Inquiry, Final Report and Patient Chart	PVA0013577; PVA0006297; PVA0006273 – PVA0006294	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
182.	--	PVA records pertaining to patient Karen A. Ziesk, including Account Inquiry, Final Report and Patient Chart	PVA0013299 – PVA0013300; PVA00055495; PVA0005484 – PVA0005493	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
183.	--	PVA records pertaining to patient Claudia T. Zunker, including Account Inquiry, Final Report and Patient Chart	PVA0011919 – PVA0011920; PVA0001514; PVA0001503 – PVA00015512	Relevance; Hearsay; Foundation; Speculation; Authenticity; Rule of completeness. Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901.		
184.	3/27/2020	James E. Alexander, Jr., M.D.'s Expert Witness Report	--	Relevance; Hearsay; Foundation; Speculation; Best evidence; Improper opinion testimony. Fed. R. Evid. 401, 403, 602, 702, 801, 802, 1002–1004.		
185.	7/8/2020	James E. Alexander, Jr., M.D.'s Supplemental Expert Witness Report	--	Relevance; Hearsay; Foundation; Speculation; Best evidence; Improper opinion testimony. Fed. R. Evid. 401, 403, 602, 702, 801, 802, 1002–1004.		
186.	3/27/2020	Robert D. Church, Jr.'s Expert Witness Report	--	Relevance; Hearsay; Foundation; Speculation; Best evidence; Improper opinion testimony. Fed. R. Evid. 401, 403, 602, 702, 801, 802, 1002–1004.		
187.	7/8/2020	Robert D. Church, Jr.'s Supplemental Expert Witness Report	--	Relevance; Hearsay; Foundation; Speculation; Best evidence; Improper opinion testimony. Fed. R. Evid. 401, 403, 602, 702, 801, 802, 1002–1004.		

188.	7/8/2020	Zachary Nye, PH.D.'s Supplemental Expert Report	--	Relevance; Hearsay; Foundation; Speculation; Best evidence; Improper opinion testimony. Fed. R. Evid. 401, 403, 602, 702, 801, 802, 1002–1004.		
189.	7/30/2020	Zachary Nye, PH.D.'s Second Supplemental Expert Report	---	Relevance; Hearsay; Foundation; Speculation; Best evidence; Improper opinion testimony. Fed. R. Evid. 401, 403, 602, 702, 801, 802, 1002–1004.		
190.	6/23/2020	Melissa Scott, CPC, CHC, CHIAP's Expert report	--			
191.	6/23/2020	Paul E. Collier, M.D.'s Expert Report	--			
192.	2/1/2019	Medicare Fraud & Abuse: Prevent, Detect, Report	--	Relevance; Hearsay; Foundation; Speculation; Authenticity. Fed. R. Evid. 401, 403, 602, 801, 802, 901. Not identified in discovery or through disclosures. Exhibit not identified with sufficient particularity.		
193.	6/19/2020	MS Medicare Program Integrity Manual: Chapter 4 – Program Integrity	--	Relevance; Hearsay; Foundation; Speculation; Authenticity. Fed. R. Evid. 401, 403, 602, 801, 802, 901. Not identified in discovery or through disclosures. Exhibit not identified with sufficient particularity.		
194.	7/21/2020	Excerpts from the Deposition Testimony of James E. Alexander, Jr., M.D.	--	Relevance; Hearsay; Foundation; Speculation; Best evidence; Improper opinion testimony. Fed. R. Evid. 401, 403, 602, 702, 801, 802, 1002–1004. Exhibit not identified with sufficient particularity.		

195.	--	Compilation of data from the Second Supplemental Expert Report of Dr. Zachary Nye, specifically, Exhibits 4d Supplemental, 9a, 9b, 10a, 10b, and 11	--	Relevance; Hearsay; Foundation; Speculation; Best evidence; Improper opinion testimony. Fed. R. Evid. 401, 403, 602, 702, 801, 802, 1002–1004. Exhibit not identified with sufficient particularity.		
196.	--	DEF0161677	DEF0161677	Relevance; Hearsay; Foundation; Speculation; Best evidence. Fed. R. Evid. 401, 403, 602, 801, 802, 1002–1004.		
197.	--	American Medical Association's Current Procedural Terminology (CPT) 2000 Professional Edition code book.	--	Cumulative; Relevance; Hearsay; Foundation; Speculation; Authenticity. Fed. R. Evid. 401, 403, 602, 801, 802, 901.		
198.	3/27/2020	Zachary Nye, PH.D.'s Expert Report	--	Relevance; Hearsay; Foundation; Speculation; Best evidence; Improper opinion testimony. Fed. R. Evid. 401, 403, 602, 701–702, 801, 802, 1002–1004.		
199.	2020	Nye Data Analysis	NYE000001	Relevance; Hearsay; Foundation; Speculation; Authenticity; Best evidence; Improper expert opinion. Fed. R. Evid. 401, 403, 602, 701–702, 801, 802, 901, 1002–1004.		
200.	2020	Nye Data Analysis	NYE000002	Relevance; Hearsay; Foundation; Speculation; Authenticity; Best evidence; Improper expert opinion. Fed. R. Evid. 401, 403, 602, 701–702, 801, 802, 901, 1002–1004.		

201.	2020	Nye Data Analysis	NYE000003	Relevance; Hearsay; Foundation; Speculation; Authenticity; Best evidence; Improper expert opinion. Fed. R. Evid. 401, 403, 602, 701–702, 801, 802, 901, 1002–1004.		
202.	2020	Nye Data Analysis	NYE000004	Relevance; Hearsay; Foundation; Speculation; Authenticity; Best evidence; Improper expert opinion. Fed. R. Evid. 401, 403, 602, 701–702, 801, 802, 901, 1002–1004.		
203.	2020	Nye Data Analysis	NYE000005	Relevance; Hearsay; Foundation; Speculation; Authenticity; Best evidence; Improper expert opinion. Fed. R. Evid. 401, 403, 602, 701–702, 801, 802, 901, 1002–1004.		
204.	2020	Nye Data Analysis	NYE000006	Relevance; Hearsay; Foundation; Speculation; Authenticity; Best evidence; Improper expert opinion. Fed. R. Evid. 401, 403, 602, 701–702, 801, 802, 901, 1002–1004.		
205.	2020	Nye Data Analysis	NYE000007	Relevance; Hearsay; Foundation; Speculation; Authenticity; Best evidence; Improper expert opinion. Fed. R. Evid. 401, 403, 602, 701–702, 801, 802, 901, 1002–1004.		

206.	2020	Nye Data Analysis	NYE000008	Relevance; Hearsay; Foundation; Speculation; Authenticity; Best evidence; Improper expert opinion. Fed. R. Evid. 401, 403, 602, 701–702, 801, 802, 901, 1002–1004.		
207.	2020	Nye Data Analysis	NYE000009	Relevance; Hearsay; Foundation; Speculation; Authenticity; Best evidence; Improper expert opinion. Fed. R. Evid. 401, 403, 602, 701–702, 801, 802, 901, 1002–1004.		
208.	2020	Nye Data Analysis	NYE000010	Relevance; Hearsay; Foundation; Speculation; Authenticity; Best evidence; Improper expert opinion. Fed. R. Evid. 401, 403, 602, 701–702, 801, 802, 901, 1002–1004.		
209.	2020	Nye Data Analysis	NYE000011	Relevance; Hearsay; Foundation; Speculation; Authenticity; Best evidence; Improper expert opinion. Fed. R. Evid. 401, 403, 602, 701–702, 801, 802, 901, 1002–1004.		
210.	2020	Nye Data Analysis	NYE000012	Relevance; Hearsay; Foundation; Speculation; Authenticity; Best evidence; Improper expert opinion. Fed. R. Evid. 401, 403, 602, 701–702, 801, 802, 901, 1002–1004.		

211.	2020	Nye Data Analysis	NYE000013	Relevance; Hearsay; Foundation; Speculation; Authenticity; Best evidence; Improper expert opinion. Fed. R. Evid. 401, 403, 602, 701–702, 801, 802, 901, 1002–1004.		
212.	2020	Nye Data Analysis	NYE000014	Relevance; Hearsay; Foundation; Speculation; Authenticity; Best evidence; Improper expert opinion. Fed. R. Evid. 401, 403, 602, 701–702, 801, 802, 901, 1002–1004.		
213.	2020	Nye Data Analysis	NYE000015	Relevance; Hearsay; Foundation; Speculation; Authenticity; Best evidence; Improper expert opinion. Fed. R. Evid. 401, 403, 602, 701–702, 801, 802, 901, 1002–1004.		
214.	2020	Nye Data Analysis	NYE000016	Relevance; Hearsay; Foundation; Speculation; Authenticity; Best evidence; Improper expert opinion. Fed. R. Evid. 401, 403, 602, 701–702, 801, 802, 901, 1002–1004.		
215.	2020	Nye Data Analysis	NYE000017	Relevance; Hearsay; Foundation; Speculation; Authenticity; Best evidence; Improper expert opinion. Fed. R. Evid. 401, 403, 602, 701–702, 801, 802, 901, 1002–1004.		

216.	2020	Nye Data Analysis	NYE000018	Relevance; Hearsay; Foundation; Speculation; Authenticity; Best evidence; Improper expert opinion. Fed. R. Evid. 401, 403, 602, 701–702, 801, 802, 901, 1002–1004.		
217.	2020	Nye Data Analysis	NYE000019	Relevance; Hearsay; Foundation; Speculation; Authenticity; Best evidence; Improper expert opinion. Fed. R. Evid. 401, 403, 602, 701–702, 801, 802, 901, 1002–1004.		
218.	2020	Nye Data Analysis	NYE000020	Relevance; Hearsay; Foundation; Speculation; Authenticity; Best evidence; Improper expert opinion. Fed. R. Evid. 401, 403, 602, 701–702, 801, 802, 901, 1002–1004.		
219.	2020	Nye Data Analysis	NYE000021	Relevance; Hearsay; Foundation; Speculation; Authenticity; Best evidence; Improper expert opinion. Fed. R. Evid. 401, 403, 602, 701–702, 801, 802, 901, 1002–1004.		
220.	2020	Nye Data Analysis	NYE000022	Relevance; Hearsay; Foundation; Speculation; Authenticity; Best evidence; Improper expert opinion. Fed. R. Evid. 401, 403, 602, 701–702, 801, 802, 901, 1002–1004.		

221.	2020	Nye Data Analysis	NYE000023	Relevance; Hearsay; Foundation; Speculation; Authenticity; Best evidence; Improper expert opinion. Fed. R. Evid. 401, 403, 602, 701–702, 801, 802, 901, 1002–1004.		
222.						
223.	2020	DEF0161675_2014	NYE000052	Relevance; Hearsay; Foundation; Speculation; Authenticity; Best evidence; Improper expert opinion. Fed. R. Evid. 401, 403, 602, 701–702, 801, 802, 901, 1002–1004.		
224.	2020	DEF0161675_2016	NYE000054	Relevance; Hearsay; Foundation; Speculation; Authenticity; Best evidence; Improper expert opinion. Fed. R. Evid. 401, 403, 602, 701–702, 801, 802, 901, 1002–1004.		
225.	2020	DEF0161675_2017	NYE000055	Relevance; Hearsay; Foundation; Speculation; Authenticity; Best evidence; Improper expert opinion. Fed. R. Evid. 401, 403, 602, 701–702, 801, 802, 901, 1002–1004.		

226.	2020	DEF0161675_2018	NYE000056	Relevance; Hearsay; Foundation; Speculation; Authenticity; Best evidence; Improper expert opinion. Fed. R. Evid. 401, 403, 602, 701–702, 801, 802, 901, 1002–1004.		
227.	2020	DEF0161675_2019	NYE000057	Relevance; Hearsay; Foundation; Speculation; Authenticity; Best evidence; Improper expert opinion. Fed. R. Evid. 401, 403, 602, 701–702, 801, 802, 901, 1002–1004.		
228.	2020	DEF0161676_medical	NYE000058	Relevance; Hearsay; Foundation; Speculation; Authenticity; Best evidence; Improper expert opinion. Fed. R. Evid. 401, 403, 602, 701–702, 801, 802, 901, 1002–1004.		
229.	2020	DEF0161677_2014_EM	NYE000059	Relevance; Hearsay; Foundation; Speculation; Authenticity; Best evidence; Improper expert opinion. Fed. R. Evid. 401, 403, 602, 701–702, 801, 802, 901, 1002–1004.		
230.	2020	EandM_2015	NYE000060	Relevance; Hearsay; Foundation; Speculation; Authenticity; Best evidence; Improper expert opinion. Fed. R. Evid. 401, 403, 602, 701–702, 801, 802, 901, 1002–1004.		

231.	2020	EandM_2016	NYE000061	Relevance; Hearsay; Foundation; Speculation; Authenticity; Best evidence; Improper expert opinion. Fed. R. Evid. 401, 403, 602, 701–702, 801, 802, 901, 1002–1004.		
232.	2020	EandM_2017	NYE000062	Relevance; Hearsay; Foundation; Speculation; Authenticity; Best evidence; Improper expert opinion. Fed. R. Evid. 401, 403, 602, 701–702, 801, 802, 901, 1002–1004.		
233.	2020	EandM_2018	NYE000063	Relevance; Hearsay; Foundation; Speculation; Authenticity; Best evidence; Improper expert opinion. Fed. R. Evid. 401, 403, 602, 701–702, 801, 802, 901, 1002–1004.		
234.	2020	EandM_2019	NYE000064	Relevance; Hearsay; Foundation; Speculation; Authenticity; Best evidence; Improper expert opinion. Fed. R. Evid. 401, 403, 602, 701–702, 801, 802, 901, 1002–1004.		
235.	2020	Montcrieff - Second Supplemental Exhibits	NYE000065	Relevance; Hearsay; Foundation; Speculation; Authenticity; Best evidence; Improper expert opinion. Fed. R. Evid. 401, 403, 602, 701–702, 801, 802, 901, 1002–1004.		

236.	2020	Moncrieff - Supplemental Exhibits (All Other Exs)	NYE000066	Relevance; Hearsay; Foundation; Speculation; Authenticity; Best evidence; Improper expert opinion. Fed. R. Evid. 401, 403, 602, 701–702, 801, 802, 901, 1002–1004.		
237.	2020	Moncrieff - Supplemental Exhibits (Exs 2, 4a.i, 4e.i, 6a.i)	NYE000067	Relevance; Hearsay; Foundation; Speculation; Authenticity; Best evidence; Improper expert opinion. Fed. R. Evid. 401, 403, 602, 701–702, 801, 802, 901, 1002–1004.		
238.	2020	Moncrieff Data Analysis (START HERE) - Supp	NYE000068	Relevance; Hearsay; Foundation; Speculation; Authenticity; Best evidence; Improper expert opinion. Fed. R. Evid. 401, 403, 602, 701–702, 801, 802, 901, 1002–1004.		
239.	2020	1) Open Data Files - Supp	NYE000069	Relevance; Hearsay; Foundation; Speculation; Authenticity; Best evidence; Improper expert opinion. Fed. R. Evid. 401, 403, 602, 701–702, 801, 802, 901, 1002–1004.		
240.	2020	2) Merge Data and Calculate False Charges	NYE000070	Relevance; Hearsay; Foundation; Speculation; Authenticity; Best evidence; Improper expert opinion. Fed. R. Evid. 401, 403, 602, 701–702, 801, 802, 901, 1002–1004.		

241.	2020	3) Exhibits for Report	NYE000071	Relevance; Hearsay; Foundation; Speculation; Authenticity; Best evidence; Improper expert opinion. Fed. R. Evid. 401, 403, 602, 701–702, 801, 802, 901, 1002–1004.		
242.	2020	4) EM Office Visit Data Analysis	NYE000072	Relevance; Hearsay; Foundation; Speculation; Authenticity; Best evidence; Improper expert opinion. Fed. R. Evid. 401, 403, 602, 701–702, 801, 802, 901, 1002–1004.		
243.	2020	5) Exhibits for Report 2	NYE000073	Relevance; Hearsay; Foundation; Speculation; Authenticity; Best evidence; Improper expert opinion. Fed. R. Evid. 401, 403, 602, 701–702, 801, 802, 901, 1002–1004.		
244.	2020	6) Supplemental Exhibits	NYE000074	Relevance; Hearsay; Foundation; Speculation; Authenticity; Best evidence; Improper expert opinion. Fed. R. Evid. 401, 403, 602, 701–702, 801, 802, 901, 1002–1004.		
245.	2020	7) Second Supplemental Exhibits	NYE000075	Relevance; Hearsay; Foundation; Speculation; Authenticity; Best evidence; Improper expert opinion. Fed. R. Evid. 401, 403, 602, 701–702, 801, 802, 901, 1002–1004.		

246.	2020	a) Read in Files Macro	NYE000076	Relevance; Hearsay; Foundation; Speculation; Authenticity; Best evidence; Improper expert opinion. Fed. R. Evid. 401, 403, 602, 701–702, 801, 802, 901, 1002–1004.		
247.	2019	Defendant's Excel Sheet	DEF002373	Relevance; Hearsay; Foundation; Authenticity; Best evidence. Fed. R. Evid. 401, 403, 801, 802, 901, 1002–1004.		
248.	2019	Defendant's Excel Sheet	DEF002374	Relevance; Hearsay; Foundation; Authenticity; Best evidence. Fed. R. Evid. 401, 403, 801, 802, 901, 1002–1004.		
249.	2019	Defendant's Excel Sheet	DEF002375	Relevance; Hearsay; Foundation; Authenticity; Best evidence. Fed. R. Evid. 401, 403, 801, 802, 901, 1002–1004.		
250.	2019	Defendant's Excel Sheet	DEF002375	Relevance; Hearsay; Foundation; Authenticity; Best evidence. Fed. R. Evid. 401, 403, 801, 802, 901, 1002–1004.		

251.	2019	Defendant's Excel Sheet	DEF002376	Relevance; Hearsay; Foundation; Authenticity; Best evidence. Fed. R. Evid. 401, 403, 801, 802, 901, 1002–1004.		
252.	2019	Defendant's Excel Sheet	DEF002377	Relevance; Hearsay; Foundation; Authenticity; Best evidence. Fed. R. Evid. 401, 403, 801, 802, 901, 1002–1004.		
253.	2019	Defendant's Excel Sheet	DEF002378	Relevance; Hearsay; Foundation; Authenticity; Best evidence. Fed. R. Evid. 401, 403, 801, 802, 901, 1002–1004.		
254.	2020	ProdAnalysisTable_DataExtraction_2.1 8. 20	--	Relevance; Hearsay; Foundation; Speculation. Fed. R. Evid. 401, 403, 602, 801, 802. Exhibit not identified with sufficient particularity.		
255.	2020	Defendant's Excel Sheet	DEF095910 - DEF096461	Relevance; Hearsay; Foundation; Authenticity; Best evidence. Fed. R. Evid. 401, 403, 801, 802, 901, 1002–1004.		

256.	2020	Defendant's Excel Sheet	DEF096462	Relevance; Hearsay; Foundation; Authenticity; Best evidence. Fed. R. Evid. 401, 403, 801, 802, 901, 1002–1004.		
257.	2020	Defendant's Excel Sheet	DEF0161675	Relevance; Hearsay; Foundation; Authenticity; Best evidence. Fed. R. Evid. 401, 403, 801, 802, 901, 1002–1004.		
258.	2020	Defendant's Excel Sheet	DEF0161676	Relevance; Hearsay; Foundation; Authenticity; Best evidence. Fed. R. Evid. 401, 403, 801, 802, 901, 1002–1004.		
259.	2020	Defendant's Excel Sheet	DEF0161677	Relevance; Hearsay; Foundation; Authenticity; Best evidence. Fed. R. Evid. 401, 403, 801, 802, 901, 1002–1004.		
260.	2020	ProdAnalysisTable_DataExtraction_2.1 8. 20	--	Relevance; Hearsay; Foundation; Speculation; Authenticity; Best evidence; Improper expert opinion. Fed. R. Evid. 401, 403, 602, 702, 801, 802, 901, 1002–1004.. Exhibit not identified with sufficient particularity.		

261.	2/1/2019	CMS Guidance on Coding and Billing Date of Service on Professional Claims	--	Relevance; Hearsay; Foundation; Speculation; Authenticity. Fed. R. Evid. 401, 403, 602, 801, 802, 901. Exhibit not identified with sufficient particularity.		
262.	2021	Medicare Fraud & Abuse: Prevent, Detect, Report	--	Relevance; Hearsay; Foundation; Speculation; Authenticity. Fed. R. Evid. 401, 403, 602, 801, 802, 901. Exhibit not identified with sufficient particularity. Not identified in discovery or through disclosures.		
263.	2021	Glossary - 2021 UnitedHealthcare Administrative Guide	--	Relevance; Hearsay; Foundation; Speculation; Authenticity. Fed. R. Evid. 401, 403, 602, 801, 802, 901. Exhibit not identified with sufficient particularity. Not identified in discovery or through disclosures.		
264.	2021	Examples of potentially fraudulent, wasteful, or abusive billing (not an inclusive list) - Chapter 17, 2021 UnitedHealthcare Administrative Guide	--	Relevance; Hearsay; Foundation; Speculation; Authenticity. Fed. R. Evid. 401, 403, 602, 801, 802, 901. Exhibit not identified with sufficient particularity. Not identified in discovery or through disclosures.		
265.	2000	American Medical Association's Current Procedural Terminology (CPT) 2000 Professional Edition code book	--	Relevance; Hearsay; Foundation; Speculation; Authenticity. Fed. R. Evid. 401, 403, 602, 801, 802, 901. Exhibit not identified with sufficient particularity. Not identified in discovery or through disclosures.		

266.	2014	American Medical Association's Current Procedural Terminology (CPT) 2014 Professional Edition code book	--	Relevance; Hearsay; Foundation; Speculation; Authenticity. Fed. R. Evid. 401, 403, 602, 801, 802, 901. Exhibit not identified with sufficient particularity. Not identified in discovery or through disclosures.		
267.	2015	American Medical Association's Current Procedural Terminology (CPT) 2015 Professional Edition code book	--	Relevance; Hearsay; Foundation; Speculation; Authenticity. Fed. R. Evid. 401, 403, 602, 801, 802, 901. Exhibit not identified with sufficient particularity. Not identified in discovery or through disclosures.		
268.	2016	American Medical Association's Current Procedural Terminology (CPT) 2016 Professional Edition code book	--	Relevance; Hearsay; Foundation; Speculation; Authenticity. Fed. R. Evid. 401, 403, 602, 801, 802, 901. Exhibit not identified with sufficient particularity. Not identified in discovery or through disclosures.		
269.	2017	American Medical Association's Current Procedural Terminology (CPT) 2017 Professional Edition code book	--	Relevance; Hearsay; Foundation; Speculation; Authenticity. Fed. R. Evid. 401, 403, 602, 801, 802, 901. Exhibit not identified with sufficient particularity. Not identified in discovery or through disclosures.		
270.	2018	American Medical Association's Current Procedural Terminology (CPT) 2018 Professional Edition code book	--	Relevance; Hearsay; Foundation; Speculation; Authenticity. Fed. R. Evid. 401, 403, 602, 801, 802, 901. Exhibit not identified with sufficient particularity. Not identified in discovery or through disclosures.		

271.	2019	American Medical Association's Current Procedural Terminology (CPT) 2019 Professional Edition code book	--	Relevance; Hearsay; Foundation; Speculation; Authenticity. Fed. R. Evid. 401, 403, 602, 801, 802, 901. Exhibit not identified with sufficient particularity. Not identified in discovery or through disclosures.		
272.	2020	American Medical Association's Current Procedural Terminology (CPT) 2020 Professional Edition code book		Relevance; Hearsay; Foundation; Speculation; Authenticity. Fed. R. Evid. 401, 403, 602, 801, 802, 901.		

Defendant's Trial Exhibit List

Exhibit No.	Date	Description	Bates Range	Relators' Objections	Adm.	Den.
501.	08/21/2020	Declaration of Kathy Britt and Exhibits (Document Previously Filed Under Seal)		a) PVA did not disclose these files in its Rule 26 Initial Disclosures or in response to production of documents, and further failed to supplement production. <i>See Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); see also Wolk v. Green, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008); Guang Dong Light Headgear Factory Co., Ltd. v. ACI Intern., Inc., No. 03-4165-JAR, 2008 WL 53665, *1 (D. Kan. Jan. 2, 2008) (identity and contents of testimony not disclosed stricken).</i> b) pursuant to Federal Rule of Evidence 106, the purported evidence violates the rule of completeness and takes after-the-		

			<p>fact snippets of evidence rather than the evidence as a whole.</p> <p>c) Improper, irrelevant, lack of personal knowledge, foundation, and prejudicial evidence of government's decision not to intervene. <i>See Fed. R. Evid. 401, 403; 602; See United States ex rel. Atkins v. McInteer</i>, 470 F.3d 1350, 1360 n.17 (11th Cir. 2006) (the United States' "absence from the fray" does not mean that the relator's claims lack merit); <i>United States ex rel. Chandler v. Cook County</i>, 277 F.3d 969, 974 n.5 (7th Cir. 2002), <i>aff'd</i>, 538 U.S. 119 (2003).</p> <p>d) hearsay by providing a statement by the OIG asserted for the truth of the matter asserted, and as to the entire declaration itself. <i>Fed. R. Evid. 801 and 802.</i></p> <p>e) Sham Affidavit rule contradicting prior deposition testimony. <i>See Doe ex rel. Doe v. Dallas Independent School Dist.</i>, 220 F.3d 380, 386 (5th Cir. 2000) ("If a party who has been examined at length on deposition could raise an issue of fact simply by submitting an affidavit contradicting his own prior testimony, this would greatly diminish the utility of summary judgment as a procedure for screening out sham issues of fact")</p>		
502.	08/21/2020	Declaration of Brian Puente		<p>a) Mr. Puente was never disclosed as a non-retained expert under Rule</p>	

				<p>26(a)(2)(c) and attempts to provide expert testimony; Fed. R. Evid. 701 and 702.</p> <p>b) PVA did not disclose the raw data, calculations, or results in its Rule 26 Initial Disclosures or in response to production of documents, and further failed to supplement production. <i>See</i> Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); <i>see also Wolk v. Green</i>, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008); <i>Guang Dong Light Headgear Factory Co., Ltd. v. ACI Intern., Inc.</i>, No. 03-4165-JAR, 2008 WL 53665, *1 (D. Kan. Jan. 2, 2008) (identity and contents of testimony not disclosed stricken).</p> <p>b) pursuant to Federal Rule of Evidence 106, the purported evidence violates the rule of completeness and takes after-the-fact snippets of evidence rather than the evidence as a whole.</p> <p>c) Improper, irrelevant, lack of personal knowledge, foundation, and prejudicial evidence of government's decision not to intervene. <i>See</i> Fed. R. Evid. 401, 403; 602</p> <p>d) hearsay as to the entire declaration. Fed. R. Evid. 801 and 802.</p>		
503.	10/31/2019	Memorandum from Kelly Cleary to Demetrios Kouzoukas re: Impact of Allina on Medicare Payment Rules	DEF0272260-0272262	<p>a) Failure to previously produce and/or to supplement production. <i>See</i> Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1);</p>		

				<p><i>see also Wolk v. Green</i>, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</p> <p>b) Improper, irrelevant, authentication/foundation, hearsay. <i>See Fed. R. Evid.</i> 401, 403, 602, 801, 802, 901.</p>		
504.		PVA Website, Doctors of Arteries & Veins, https://pvasatx.com/about-us/about-pva/	DEF0272263-0272267	<p>a) Failure to previously produce and/or to supplement production. <i>See Fed. R. Civ. Proc.</i> 26(e); <i>Fed. R. Civ. Proc.</i> 37(c)(1); <i>see also Wolk v. Green</i>, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</p> <p>b) Improper, irrelevant, authentication/foundation, hearsay. <i>See Fed. R. Evid.</i> 401, 403, 602, 801, 802, 901.</p>		
505.		PVA Website, PVA Vascular Lab, https://pvasatx.com/service-lines/vascular- lab/	DEF0272268-0272272	<p>a) Failure to previously produce and/or to supplement production. <i>See Fed. R. Civ. Proc.</i> 26(e); <i>Fed. R. Civ. Proc.</i> 37(c)(1); <i>see also Wolk v. Green</i>, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</p> <p>b) Improper, irrelevant, authentication/foundation, hearsay. <i>See Fed. R. Evid.</i> 401, 403, 602, 801, 802, 901.</p>		
506.		PVA Website, Locations, https://pvasatx.com/locations/	DEF0272273-0272277	<p>a) Failure to previously produce and/or to supplement production. <i>See Fed. R. Civ. Proc.</i> 26(e); <i>Fed. R. Civ. Proc.</i> 37(c)(1); <i>see also Wolk v. Green</i>, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</p>		

				b) Improper, irrelevant, authentication/foundation, hearsay. <i>See Fed. R. Evid. 401, 403, 602, 801, 802, 901.</i>		
507.		PVA Website, PVA Doctors and Providers, https://pvasatx.com/pva-doctors-providers/	DEF0272278-0272281	<p>a) Failure to previously produce and/or to supplement production. <i>See Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); see also Wolk v. Green, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</i></p> <p>b) Improper, irrelevant, authentication/foundation, hearsay. <i>See Fed. R. Evid. 401, 403, 602, 801, 802, 901.</i></p>		
508.		Local Coverage Determination, Non-Invasive Cerebrovascular Arterial Studies (L35397)				
509.		Novitas Solutions, Medicare Part B Physician Fee Schedule for Texas 2019				
510.		DOJ Justice Manual § 1-20.100		<p>a) Failure to previously produce and/or to supplement production. <i>See Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); see also Wolk v. Green, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</i></p> <p>b) Improper, irrelevant, authentication/foundation, doctrine of completeness and best evidence rule, hearsay. <i>See Fed. R. Evid. 106, 401, 403, 602, 801, 802, 901, 1002-1004.</i></p>		
511.	10/17/2019	Deposition and Exhibits of Roberta Martinez				

512.	10/16/2019	Deposition and Exhibits of Tiffany Monterieff				
513.	10/15/2019	Deposition and Exhibits of Alicia Burnett				
514.	07/24/2020	Deposition and Exhibits of Robert D. Church				
515.	07/21/2020	Deposition and Exhibits of James E. Alexander M.D.				
516.	07/31/2020	Deposition and Exhibits of Zachary Nye				
517.	03/27/2020	Expert Report of James E. Alexander (Alexander Depo Ex. 3)				
518.		Expert Report of James E. Alexander Exhibit 1: Curriculum Vitae for James E. Alexander, Jr. MD				
519.		Expert Report of James E. Alexander Exhibit 2: List of Duties of a Medicare Contractor Medical Director from Medicare Program Integrity Manual Chapter 1				
520.		Expert Report of James E. Alexander Exhibit 3: DHHS Fraud & Abuse Laws Physician Roadmap				
521.		Expert Report of James E. Alexander Exhibit 3: CMS MLN Booklet Medicare Fraud 7 Abuse: Prevent, Detect, Report				
522.		Expert Report of James E. Alexander Exhibit 3: Medicare Program Integrity Manual Chapter 4 – Program Integrity				
523.		Expert Report of James E. Alexander Exhibit 3: Medicare Claims Processing Manual Chapter 13 - Radiology				

		Services and Other Diagnostic Procedures				
524.		Expert Report of James E. Alexander Exhibit 3: ICD Coding for Diagnostic Tests				
525.		Expert Report of James E. Alexander Exhibit 3: 42 CFR § 415.120(a)				
526.	09/2014	Expert Report of James E. Alexander Exhibit 3: THE CODE: The Official Medical Coding Newsletter of MiraMed Distinguishing Diagnostic Testing Review from Reports Are Your TEE Reports Compliant?				
527.		Expert Report of James E. Alexander Exhibit 3: CMS MLN Matters: Guidance on Coding and Billing Date of Service on Professional Claims				
528.		Expert Report of James E. Alexander Exhibit 3: Medicare Benefit Policy Manual Chapter 15 – Covered Medical and Other Health Services				
529.		Expert Report of James E. Alexander Exhibit 3: Novitas JH MAC website Billing Q&A's				
530.		Expert Report of James E. Alexander Exhibit 3: AMA CPT 2017 Professional codebook				
531.	11/2015	Expert Report of James E. Alexander Exhibit 3: Radiology Today: Radiology Billing and coding: Professional and Technical Components by G. John Verhovshek, MA, CPC				
532.		Expert Report of James E. Alexander Exhibit 4: Novitas Reasonable & Necessary Guidelines				

533.		Expert Report of James E. Alexander Exhibit 4: Medicare Program Integrity Manual Chapter 3 - Verifying Potential Errors and Taking Corrective Actions				
534.		Expert Report of James E. Alexander Exhibit 4: Medicare Program Integrity Manual Chapter 13 - Local Coverage Determinations				
535.		Expert Report of James E. Alexander Exhibit 5: IAC Standards and Guidelines for Vascular Testing Accreditation				
536.		Expert Report of James E. Alexander Exhibit 6: Clinical Case Samples of Delayed or Absent Final Interpretation and Report in Complicated Medicare Patients				
537.	03/27/2020	Expert Report of Robert D. Church (Church Depo Ex. 4)				
538.		Expert Report of Robert D. Church Exhibit DD: Medical Documentation & Coding Compliance Pledge to Peripheral Vascular Associates, Pages 1-20.				
539.		Expert Report of Robert D. Church Exhibit EE: Peripheral Vascular Associates Compliance Plan, Policies and Procedures Manual				
540.	04/2010	Expert Report of Robert D. Church Exhibit FF: PVA Policies and Procedures – Clarification of Indications for Examinations, Exhibit 3	PVA0015425			
541.	05/02/2017 - 05/03/2017	Expert Report of Robert D. Church Exhibit GG: PVA Pat #8586-Emails, Exhibit 4	PVA0039598-0039601			

542.		Expert Report of Robert D. Church Exhibit HH: PY A OT read and study times.xlsx. Reflecting report times, read times, total times, number of reports, for 2016 and 2017.	PVA0236767			
543.		Expert Report of Robert D. Church Exhibit II: Society for Vascular Ultrasound-Vascular Technology Professional Performance Guidelines. Extracranial Cerebrovascular Duplex Ultrasound Evaluation. Exhibit 10	PVA0103238-0103243			
544.		Expert Report of Robert D. Church Exhibit JJ: Peripheral Vascular Associates-Account Inquiry-Patient 999999978. Exhibit 14	PVA0014087			
545.		Expert Report of Robert D. Church Exhibit KK: Peripheral Vascular Associates-Account Inquiry- Patient 773750. Exhibit 17	PVA0014061			
546.		Expert Report of Robert D. Church Exhibit LL: Peripheral Vascular Associates-Screen print. Exhibit 15	PVA0007722			
547.	07/2001	Expert Report of Robert D. Church Exhibit SS: Coding and Reimbursement Issues for the Radiologist by Phillips and Hillman				
548.	03/27/2020	Expert Report of Zachary Nye (Nye Depo Ex. 3)				
549.		Expert Report of Zachary Nye Exhibit 1: Zachary R. Nye CV				
550.		Expert Report of Zachary Nye Exhibit 2: Summary of False Billings in the Billing System Data for Imaging				
551.		Expert Report of Zachary Nye Exhibit 3: Distribution of False Billings for				

		Imaging by Number of Days Before Final Report Date				
552.		Expert Report of Zachary Nye Exhibit 4a: Total Payments Associated with False Billings for Imaging				
553.		Expert Report of Zachary Nye Exhibit 4b: Total Payments Associated with False Billings for Imaging				
554.		Expert Report of Zachary Nye Exhibit 4c: Total Payments Associated with False Billings for Imaging				
555.		Expert Report of Zachary Nye Exhibit 4d: Total Payments Associated with False Billings for Imaging				
556.		Expert Report of Zachary Nye Exhibit 4e: Total Payments Associated with False Billings for Imaging				
557.		Expert Report of Zachary Nye Exhibit 5: Chart of Number of Days Between Test Date and Final Report Date				
558.		Expert Report of Zachary Nye Exhibit 6a: Total Payments Associated with False Billings for E/M Services				
559.		Expert Report of Zachary Nye Exhibit 6b: Total Payments Associated with False Billings for E/M Services				
560.		Expert Report of Zachary Nye Exhibit 6c: Total Payments Associated with False Billings for E/M Services				
561.		Expert Report of Zachary Nye Exhibit 6d: Total Payments Associated with False Billings for E/M Services				

562.		Expert Report of Zachary Nye Exhibit 6e: Total Payments Associated with False Billings for E/M Services				
563.		Expert Report of Zachary Nye Exhibit 7: Chart Time Between Consecutive Final Report Dates				
564.		Expert Report of Zachary Nye Exhibit 8: Chart Number of Tests Per Day				
565.	07/08/2020	Supplemental Expert Report of James Alexander M.D. (Alexander Depo Ex. 4)				
566.		Supplemental Expert Report of James Alexander M.D. Exhibit 1: CV for James E. Alexander, Jr., MD FACS CHC				
567.		Supplemental Expert Report of James Alexander M.D. Exhibit 2: Medicare Program Integrity Manual excerpt, chapter 1				
568.		Supplemental Expert Report of James Alexander M.D. Exhibit 3: Office of Inspector General, compliance excerpt				
569.		Supplemental Expert Report of James Alexander M.D. Exhibit 4: False Claims Act excerpts and discussion				
570.		Supplemental Expert Report of James Alexander M.D. Exhibit 5: CMS publication, ICN MLN4649244				
571.		Supplemental Expert Report of James Alexander M.D. Exhibit 6: Medicare Program Integrity Manual excerpt, chapter 4				
572.		Supplemental Expert Report of James Alexander M.D. Exhibit 7: Medicare				

		Claims Processing Manual excerpt, Chapter 13				
573.		Supplemental Expert Report of James Alexander M.D. Exhibit 8: 42 CFR § 415.120				
574.		Supplemental Expert Report of James Alexander M.D. Exhibit 9: 42 CFR § 415.102				
575.		Supplemental Expert Report of James Alexander M.D. Exhibit 10: The CODE, medical newsletter excerpt				
576.		Supplemental Expert Report of James Alexander M.D. Exhibit 11: CMS MLN Guidance on Coding				
577.		Supplemental Expert Report of James Alexander M.D. Exhibit 12: Medicare Benefit Policy Manual, excerpt chapter 15				
578.		Supplemental Expert Report of James Alexander M.D. Exhibit 13: Novitas-Solutions FAQ				
579.		Supplemental Expert Report of James Alexander M.D. Exhibit 14: AMA CPT 2017 Professional booklet excerpts				
580.		Supplemental Expert Report of James Alexander M.D. Exhibit 15: Radiology Today article by John Verhovshek				
581.		Supplemental Expert Report of James Alexander M.D. Exhibit 16: Novitas-Solutions excerpt				
582.		Supplemental Expert Report of James Alexander M.D. Exhibit 17: Medicare Program Integrity Manual, excerpt chapter 3				

583.		Supplemental Expert Report of James Alexander M.D. Exhibit 18: Medicare Program Integrity Manual, chapter 13				
584.		Supplemental Expert Report of James Alexander M.D. Exhibit 19: Intersocietal Accreditation Commission (IAC) Guidelines on Examination Interpretation and Reports	PVA0015495, 0015509-0015514			
585.		Supplemental Expert Report of James Alexander M.D. Exhibit 20: Clinical Case Samples of Delayed and Absent Final Interpretation and Report in Complicated Medicare Patient 100855	PVA0000504. 0000561, 0011633, 0011626-0011627, 0000555, 0000509-0000510, 0000508, 0000519, 0000525			
586.		Supplemental Expert Report of James Alexander M.D. Exhibit 21: Clinical Case Samples of Delayed and Absent Final Interpretation and Report in Complicated Medicare Patient 580210	PVA0009824, 0009864-0009866, 0009863, 0009826-0009828, 0009840-0009844			
587.		Supplemental Expert Report of James Alexander M.D. Exhibit 22: Clinical Case Samples of Delayed and Absent Final Interpretation and Report in Complicated Medicare Patient 739250	PVA0005264, 0013205-0013206, 0005251-0005259			
588.		Supplemental Expert Report of James Alexander M.D. Exhibit 23: AIUM Practice Parameter for Documentation of an Ultrasound Examination				
589.		Supplemental Expert Report of James Alexander M.D. Exhibit 24: American Urological Association (AUA), AIUM Medical Documentation Requirements				
590.		Supplemental Expert Report of James Alexander M.D. Exhibit 25: Access				

		Surgery: Chapter 17, Documentation, Coding, Billing and Compliance				
591.		Supplemental Expert Report of James Alexander M.D. Exhibit 26: American College of Radiology (ACR) Practice Parameter for the Performing and Interpreting Diagnostic Ultrasound Examinations				
592.		Supplemental Expert Report of James Alexander M.D. Exhibit 27: AUA: Ultrasound Documentation Requirements				
593.		Supplemental Expert Report of James Alexander M.D. Exhibit 28: ACR-SPR-SRU Practice Parameter Performing				
594.		Supplemental Expert Report of James Alexander M.D. Exhibit 28: ACR-SPR-SRU Practice Parameter Performing				
595.		Supplemental Expert Report of James Alexander M.D. Exhibit 29: ACR-AIUM- SPR-SRU Practice Parameter for the Performance of Peripheral Venous Ultrasound Examination				
596.	07/08/2020	Supplemental Expert Report of Robert D. Church (Church Depo Ex. 5)				
597.		Supplemental Expert Report of Robert D. Church Attachment A: Marked-up copy of complaint				
598.		Supplemental Expert Report of Robert D. Church Attachment I: Wisconsin Physicians Service Insurance Corporation- Non-Invasive Vascular Testing (N.I.V.T.). Local Coverage Determination Coding Guidelines				

599.		Supplemental Expert Report of Robert D. Church Attachment DD: Medical Documentation & Coding Compliance Pledge to Peripheral Vascular Associates, Pages 1-20	DEF000693-000712			
600.		Supplemental Expert Report of Robert D. Church Attachment EE: Peripheral Vascular Associates Compliance Plan, Policies and Procedures Manual.	DEF000714-000747			
601.		Supplemental Expert Report of Robert D. Church Attachment FF: PVA Policies and Procedures. Exhibit 3	PVA0015425			
602.		Supplemental Expert Report of Robert D. Church Attachment GG: PVA Pat #8586- Emails, Exhibit 4.	PVA0039598-0039601			
603.		Supplemental Expert Report of Robert D. Church Attachment HH: PVA DT read and study times.xlsx. Reflecting report times, read times, total times, number of reports, for 2016 and 2017	PVA0236767			
604.		Supplemental Expert Report of Robert D. Church Attachment II: Society for Vascular Ultrasound-Vascular Technology Professional Performance Guidelines. Extracranial Cerebrovascular Duplex Ultrasound Evaluation. Exhibit 10	PVA0103238-0103243			
605.		Expert Report of Robert D. Church Exhibit JJ: Peripheral Vascular Associates-Account Inquiry-Patient 999999978. Exhibit 14	PVA0014087			
606.		Expert Report of Robert D. Church Exhibit KK: Peripheral Vascular Associates-Account Inquiry- Patient 773750. Exhibit 17	PVA0014061			

607.		Expert Report of Robert D. Church Exhibit LL: Peripheral Vascular Associates-Screen print. Exhibit 15	PVA0007722			
608.		Expert Report of Robert D. Church Exhibit SS: Coding and Reimbursement Issues for the Radiologist by Phillips and Hillman				
609.		Supplemental Expert Report of Robert D. Church Attachment TT: ACR Practice Parameters for Communication of Diagnostic Imaging Findings				
610.	07/08/2020	Supplemental Expert Report and Exhibits of Zachary Nye (Nye Depo Ex. 4)				
611.		Expert Report of Zachary Nye Exhibit 1: Zachary R. Nye CV				
612.		Expert Report of Zachary Nye Exhibit 2: Summary of False Billings in the Billing System Data for Imaging				
613.		Expert Report of Zachary Nye Exhibit 3: Distribution of False Billings for Imaging by Number of Days Before Final Report Date				
614.		Expert Report of Zachary Nye Exhibit 4a: Total Payments Associated with False Billings for Imaging				
615.		Expert Report of Zachary Nye Exhibit 4ai: Total Payments Associated with False Billings for Imaging				
616.		Expert Report of Zachary Nye Exhibit 4b: Total Payments Associated with False Billings for Imaging				
617.		Expert Report of Zachary Nye Exhibit 4c: Total Payments Associated with False Billings for Imaging				

618.		Expert Report of Zachary Nye Exhibit 4d: Total Payments Associated with False Billings for Imaging				
619.		Expert Report of Zachary Nye Exhibit 4e: Total Payments Associated with False Billings for Imaging				
620.		Expert Report of Zachary Nye Exhibit 4ei: Total Payments Associated with False Billings for Imaging				
621.		Expert Report of Zachary Nye Exhibit 5: Chart of Number of Days Between Test Date and Final Report Date				
622.		Expert Report of Zachary Nye Exhibit 6a: Total Payments Associated with False Billings for E/M Services				
623.		Expert Report of Zachary Nye Exhibit 6ai: Total Payments Associated with False Billings for E/M Services				
624.		Expert Report of Zachary Nye Exhibit 6b: Total Payments Associated with False Billings for E/M Services				
625.		Expert Report of Zachary Nye Exhibit 6c: Total Payments Associated with False Billings for E/M Services				
626.		Expert Report of Zachary Nye Exhibit 6d: Total Payments Associated with False Billings for E/M Services				
627.		Expert Report of Zachary Nye Exhibit 6e: Total Payments Associated with False Billings for E/M Services				

628.		Expert Report of Zachary Nye Exhibit 7: Chart Time Between Consecutive Final Report Dates				
629.		Expert Report of Zachary Nye Exhibit 8: Chart Number of Tests Per Day				
630.	07/30/2020	Second Supplemental Expert Report of Zachary Nye (Nye Depo Ex. 5)				
631.		Second Supplemental Expert Report of Zachary Nye Exhibit 4ai Supplemental: Total Payments Associated with False Billings for Imaging				
632.		Second Supplemental Expert Report of Zachary Nye Exhibit 4d Supplemental: Total Payments Associated with False Billings for Imaging				
633.		Second Supplemental Expert Report of Zachary Nye Exhibit 6ai Supplemental: Total Payments Associated with False Billings for E/M Services				
634.		Second Supplemental Expert Report of Zachary Nye Exhibit 6d Supplemental: Total Payments Associated with False Billings for E/M Services				
635.		Second Supplemental Expert Report of Zachary Nye Exhibit 9a: False Billings for Imaging Where Billing MD Not Equal to Reading MD				
636.		Second Supplemental Expert Report of Zachary Nye Exhibit 9b: Payments Associated with False Billings for Imaging Where Billing MD Not Equal to Reading MD				
637.		Second Supplemental Expert Report of Zachary Nye Exhibit 10a: False				

		Billings for Imaging Where No E/M Visit Between Date of Service and Charge Date				
638.		Second Supplemental Expert Report of Zachary Nye Exhibit 10b: Payments Associated with False Billings for Imaging Where No E/M Visit Between Date of Service and Charge Date				
639.		Second Supplemental Expert Report of Zachary Nye Exhibit 11: Distribution of False Billings for Imaging by Insurance Name and Number of Days Before Final Report Date				
640.		Second Supplemental Expert Report of Zachary Nye Exhibit 12: Distribution of False Billings for E/M Services by Insurance Name and Number of Days Before Final Report Date				
641.	06/23/2020	Expert Report of Melissa Scott		Improper and irrelevant as to issues of materiality and damages; not previously designated or qualified as an expert relating to damages and/or as rebuttal to Dr. Nye; hearsay. <i>See Fed. R. Evid. 401, 403, 602, 701, 702, 801, 802.</i>		
642.		Expert Report of Melissa Scott Appendix 1: Melissa Scott Curriculum Vitae		Improper and irrelevant as to issues of materiality and damages; not previously designated or qualified as an expert relating to damages and/or as rebuttal to Dr. Nye; hearsay. <i>See Fed. R. Evid. 401, 403, 602, 701, 702, 801, 802.</i>		
643.		Expert Report of Melissa Scott Appendix 2: List of Documents Considered		Improper and irrelevant as to issues of materiality and damages; not previously designated or qualified as an expert relating to damages and/or as rebuttal to		

				Dr. Nye; hearsay. <i>See</i> Fed. R. Evid. 401, 403, 602, 701, 702, 801, 802.		
644.		Expert Report of Melissa Scott Appendix 3: Patient Sampling records		Improper and irrelevant as to issues of materiality and damages; not previously designated or qualified as an expert relating to damages and/or as rebuttal to Dr. Nye; hearsay. <i>See</i> Fed. R. Evid. 401, 403, 602, 701, 702, 801, 802.		
645.	12/21/2017	First Amended Complaint for the case dated December 21, 2017	SCOTT000006- 000025			
646.		Documents Provided to OIG	PVA0000001- 0238036	Improper, irrelevant, authentication/foundation, hearsay, cumulative. <i>See</i> Fed. R. Evid. 401, 403, 602, 801, 802, 901.		
647.		Documents from Plaintiffs' data analyst expert, Zachary Nye, PhD	NYE000001- 000051			
648.		Documents from Plaintiffs' expert, Robert Church	SCOTT000031- 000415, SCOTT003784- 003787			
649.		Documents from Plaintiffs' expert, Dr. James Alexander (Alexander Depo Ex. 2)	ALEXANDER00 0001- 001593			
650.		Melissa Scott Working File	SCOTT0001- 003787	Improper and irrelevant as to issues of materiality and damages; not previously designated or qualified as an expert relating to damages and/or as rebuttal to Dr. Nye; hearsay. <i>See</i> Fed. R. Evid. 401, 403, 602, 701, 702, 801, 802.		
651.	06/23/2020	Expert Report of Paul E. Collier, M.D.		Improper and irrelevant as to issues of materiality and damages; hearsay. <i>See</i> Fed. R. Evid. 401, 403, 801, 802.		
652.		Expert Report of Paul E. Collier, M.D. Exhibit 1: Paul E. Collier, MD Curriculum Vitae		Improper and irrelevant as to issues of materiality and damages; hearsay. <i>See</i> Fed. R. Evid. 401, 403, 801, 802.		

653.		Expert Report of Paul E. Collier, M.D. Exhibit 2: Paul E. Collier, MD Testimony List		Improper and irrelevant as to issues of materiality and damages; hearsay. <i>See</i> Fed. R. Evid. 401, 403, 801, 802.		
654.		Expert Report of Paul E. Collier, M.D. Exhibit 3: Paul E. Collier, MD Fee Schedule		Improper and irrelevant as to issues of materiality and damages; hearsay. <i>See</i> Fed. R. Evid. 401, 403, 801, 802.		
655.		Paul E. Collier Working File	PEC 000001-000999	Improper and irrelevant as to issues of materiality and damages. <i>See</i> Fed. R. Evid. 401, 403. Authentication/ foundation, hearsay. <i>See</i> Fed. R. Evid. 602, 801, 802, 901.		
656.	01/25/18	<i>Limiting Use of Agency Guidance Documents in Affirmative Civil Enforcement Cases, U.S. Department of Justice</i> , Jan. 25, 2018.	DEF0272904-0272905	a) Failure to previously produce and/or to supplement production. <i>See</i> Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); <i>see also Wolk v. Green</i> , No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008). b) Lack of authentication/ foundation, hearsay. <i>See</i> Fed. R. Evid. 401, 403, 801, 802, 901.		
657.		<i>Department of Health and Human Services Good Guidance Practices</i> , U.S. Department of Health and Human Services, 85 Fed. Reg. 78770 (Dec. 7, 2020).		a) Failure to previously produce and/or to supplement production. <i>See</i> Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); <i>see also Wolk v. Green</i> , No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008). b) Lack of authentication/ foundation, hearsay. <i>See</i> Fed. R. Evid. 401, 403, 801, 802, 901.		
658.		<i>Advisory Opinion 20-05 on Implementing Allina</i> , U.S. Department of Health and Human Services Office of the General Counsel (Dec. 3, 2020).		a) Failure to previously produce and/or to supplement production. <i>See</i> Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); <i>see also Wolk v. Green</i> , No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb.		

		https://www.hhs.gov/sites/default/files/alli_na-ao.pdf		1, 2008). b) Improper, irrelevant, authentication/foundation, hearsay. <i>See</i> Fed. R. Evid. 401, 403, 801, 802, 901.		
659.		<i>Transparency and Fairness in Civil Administrative Enforcement Actions</i> , U.S. Department of Health and Human Services, 86 Fed. Reg. 3010 (Jan. 14, 2021).		a) Failure to previously produce and/or to supplement production. <i>See</i> Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); <i>see also Wolk v. Green</i> , No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008). b) Improper, irrelevant, authentication/foundation, hearsay. <i>See</i> Fed. R. Evid. 401, 403, 801, 802, 901.		
660.		PVA Organizational Chart	DEF0272282	a) Failure to previously produce and/or to supplement production. <i>See</i> Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); <i>see also Wolk v. Green</i> , No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008). b) Improper, irrelevant, authentication/foundation, hearsay. <i>See</i> Fed. R. Evid. 401, 403, 801, 802, 901.		
661.		Chapter 8 – Sentencing or Organizations, United States Sentencing Commission. (https://www.ussc.gov/guidelines/2015-guidelines-manual/2015-chapter-8)		a) Failure to previously produce and/or to supplement production. <i>See</i> Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); <i>see also Wolk v. Green</i> , No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008). b) Improper, irrelevant, authentication/foundation, hearsay. <i>See</i> Fed. R. Evid.		

				401, 403, 801, 802, 901.		
662.		PVA Employment Application (Martinez Depo Ex. 1)	DEF000324- 000327	Improper, irrelevant, and probative value outweighed by risk of prejudice. <i>See Fed. R. Evid. 401, 403.</i>		
663.		Resume of Roberta Martinez (Martinez Depo Ex. 2)	DEF000329- 000332	Improper, irrelevant, and probative value outweighed by risk of prejudice. <i>See Fed. R. Evid. 401, 403.</i>		
664.		Texas Workforce Commission logs (Martinez Depo Ex. 3)	MARTINEZ0002 58-000274	Improper, irrelevant, and probative value outweighed by risk of prejudice. <i>See Fed. R. Evid. 401, 403.</i>		
665.		Roberta Martinez Handbook Acknowledgement (Martinez Depo Ex. 4)	DEF000352	Improper, irrelevant, and probative value outweighed by risk of prejudice. <i>See Fed. R. Evid. 401, 403.</i>		
666.		Roberta Martinez Employee Acknowledgement Form (Martinez Depo Ex. 5)	DEF000353	Improper, irrelevant, and probative value outweighed by risk of prejudice. <i>See Fed. R. Evid. 401, 403.</i>		
667.		Employee Confidentiality/Nondisclosure Agreement (Martinez Depo Ex. 6 and Montcrieff Depo Ex. 1)	DEF000740	Improper, irrelevant, and probative value outweighed by risk of prejudice. <i>See Fed. R. Evid. 401, 403.</i>		
668.		Information Security and Confidentiality Agreement (Martinez Depo Ex. 7 and Montcrieff Depo Ex. 2)	DEF000741- 000742	Improper, irrelevant, and probative value outweighed by risk of prejudice. <i>See Fed. R. Evid. 401, 403.</i>		
669.		Compliance Pledge (Martinez Depo Ex. 8 and Montcrieff Depo Ex. 3)	DEF000693- 000738	Improper, irrelevant, and probative value outweighed by risk of prejudice. <i>See Fed. R. Evid. 401, 403.</i>		

670.		Coding and Compliance Pledge (Martinez Depo Ex. 9)	MARTINEZ0000 01-000048			
671.		PVA medical records (Martinez Depo Ex. 9a)	MARTINEZ0000 49-000274	b) Improper, irrelevant, authentication/foundation. <i>See Fed. R. Evid. 401, 403, 901.</i>		
672.		PVA Job Description (Martinez Depo Ex. 10)	DEF000354- 000356	Improper, irrelevant, and probative value outweighed by risk of prejudice. <i>See Fed. R. Evid. 401, 403.</i>		
673.	10/19/2015	Email from Barbara Burrow to Randi Balch and Lori Rice (Martinez Depo Ex. 12)	DEF000415- 000416	Improper, irrelevant, hearsay, and probative value outweighed by risk of prejudice. <i>See Fed. R. Evid. 401, 403, 801, 802.</i> Authentication/ foundation, hearsay. <i>See Fed. R. Evid. 801, 802, 901.</i>		
674.	10/21/2015	Email from Barbara Burrow to Roberta Martinez (Martinez Depo Ex. 13)	DEF000418	Improper, irrelevant, hearsay, and probative value outweighed by risk of prejudice. <i>See Fed. R. Evid. 401, 403, 801, 802.</i>		
675.	04/21/2016	Email from Barbara Burrow to Roberta Martinez (Martinez Depo Ex. 15)	DEF000437	Improper, irrelevant, hearsay, and probative value outweighed by risk of prejudice; authentication/ foundation. <i>See Fed. R. Evid. 401, 403, 801, 802, 901.</i>		
676.	05/03/2016	Email from B. Burrow to Larina Montejano (Martinez Depo Ex. 16)	DEF000438	Improper, irrelevant, hearsay, and probative value outweighed by risk of prejudice; authentication/ foundation. <i>See Fed. R. Evid. 401, 403, 801, 802, 901.</i>		
677.	08/30/2016	Email from Barbara Burrow to Larina Montejano (Martinez Depo Ex. 18)	DEF000441	Improper, irrelevant, hearsay, and probative value outweighed by risk of prejudice; authentication/ foundation. <i>See Fed. R. Evid. 401, 403, 801, 802,</i>		

				901.		
678.	08/31/2016	Email from Barbara Burrow to Larina Montejano (Martinez Depo Ex. 17)	DEF000440	Improper, irrelevant, hearsay, and probative value outweighed by risk of prejudice; authentication/ foundation. <i>See Fed. R. Evid. 401, 403, 801, 802, 901.</i>		
679.	08/31/2016	Employee Counseling Statement (Martinez Depo Ex. 19)	DEF000444- 000445	Improper, irrelevant, hearsay, and probative value outweighed by risk of prejudice; authentication/ foundation. <i>See Fed. R. Evid. 401, 403, 801, 802, 901.</i>		
680.	08/31/2016	Employee Counseling Statement (Martinez Depo Ex. 20)	DEF000442- 000443	Improper, irrelevant, hearsay, and probative value outweighed by risk of prejudice; authentication/ foundation. <i>See Fed. R. Evid. 401, 403, 801, 802, 901.</i>		
681.	08/31/2016	Email from Barbara Burrow to Larina Montejano (Martinez Depo Ex. 11)	DEF000409- 000411	Improper, irrelevant, hearsay, and probative value outweighed by risk of prejudice; authentication/ foundation. <i>See Fed. R. Evid. 401, 403, 801, 802, 901.</i>		
682.	08/31/2016	Email from Barbara Burrow to Larina Montejano (Martinez Depo Ex. 14)	DEF000436	Improper, irrelevant, hearsay, and probative value outweighed by risk of prejudice; authentication/ foundation. <i>See Fed. R. Evid. 401, 403, 801, 802, 901.</i>		
683.		PVA medical records (Martinez Depo Ex. 21)	MARTINEZ0000 48-000078	Improper, irrelevant, and probative value outweighed by risk of prejudice; authentication/ foundation. <i>See Fed. R. Evid. 401, 403, 901.</i>		
684.		Text messages (Martinez Depo Ex. 22)	MARTINEZ0000 79-000083	Improper, irrelevant, hearsay, and probative value outweighed by risk of prejudice. <i>See Fed. R. Evid. 401, 403, 801, 802.</i>		

685.		Text messages (Martinez Depo Ex. 23)	MARTINEZ0000 87-000091	Improper, irrelevant, hearsay, and probative value outweighed by risk of prejudice. <i>See Fed. R. Evid. 401, 403, 801, 802.</i>		
686.		Text messages (Martinez Depo Ex. 24 and Burnett Depo Ex. 30)	MARTINEZ0000 96	Improper, irrelevant, hearsay, and probative value outweighed by risk of prejudice. <i>See Fed. R. Evid. 401, 403, 801, 802.</i>		
687.		Text messages (Martinez Depo Ex. 25 and Burnett Depo Ex. 29)	MARTINEZ0000 093-000095	Improper, irrelevant, hearsay, and probative value outweighed by risk of prejudice. <i>See Fed. R. Evid. 401, 403, 801, 802.</i>		
688.	09/12/2019	Martinez's Responses to Defendant's First Set of Interrogatories (Martinez Depo Ex. 27)		Improper, irrelevant, and probative value outweighed by risk of prejudice as related to employment claims. <i>See Fed. R. Evid. 401, 403.</i>		
689.	02/15/2015	Alicia Burnett Application for Employment (Burnett Depo Ex. 1)	DEF000002- 000005	Improper, irrelevant, and probative value outweighed by risk of prejudice. <i>See Fed. R. Evid. 401, 403.</i>		
690.		UltrasoundJOBs.com profile (Burnett Depo Ex. 2)	DEF000015- 000017	Improper, irrelevant, hearsay, and probative value outweighed by risk of prejudice; authentication/ foundation. <i>See Fed. R. Evid. 401, 403, 801, 802, 901.</i>		
691.		2016 W-2 and earnings summary (Burnett Depo Ex. 3)	DEF001505- 001508	Improper, irrelevant, and probative value outweighed by risk of prejudice and confusion of claims. <i>See Fed. R. Evid. 401, 403.</i>		
692.		Notice of application for unemployment benefits (Burnett Depo Ex. 4)	DEF000320	Improper, irrelevant, and probative value outweighed by risk of prejudice and confusion of claims. <i>See Fed. R. Evid. 401, 403.</i>		
693.	12/07/2015	Letter from PVA to Alicia Gomez (Burnett Depo Ex. 5)	DEF000031- 000033	Improper, irrelevant, and probative value outweighed by risk of prejudice and confusion of claims. <i>See Fed. R. Evid. 401, 403.</i>		

694.		PVA Employee Confidentiality/Non-Disclosure Agreement (Burnett Depo Ex. 6)	DEF000740	Improper, irrelevant, and probative value outweighed by risk of prejudice and confusion of claims. <i>See Fed. R. Evid. 401, 403.</i>		
695.		PVA Information Security and Confidentiality Agreement (Burnett Depo Ex. 7)	DEF000741- 000742	Improper, irrelevant, and probative value outweighed by risk of prejudice and confusion of claims. <i>See Fed. R. Evid. 401, 403.</i>		
696.		PVA Medical Documentation & Coding Compliance Pledge (Burnett Depo Ex. 8)	DEF000693- 000738			
697.		Staff Registered Vascular Technologist job summary (Burnett Depo Ex. 9)	DEF000241- 000243			
698.		Lead Staff Registered Vascular Technologist job summary (Burnett Depo Ex. 10)	DEF000245- 000247			
699.		Email from Barbara Burrow entitled No Longer Need to Use ICD-10 Codes on Reports (Burnett Depo Ex. 11)	BURNETT00001 5	Improper, irrelevant, hearsay, and probative value outweighed by risk of prejudice; authentication/ foundation. <i>See Fed. R. Evid. 401, 403, 801, 802, 901.</i>		
700.	07/15/2016	Employee Counseling Statement (Burnett Depo Ex. 12)	DEF000254- 000255	Improper, irrelevant, and probative value outweighed by risk of prejudice and confusion of claims. <i>See Fed. R. Evid. 401, 403.</i>		
701.	08/22/2016	Employee Counseling Statement (Burnett Depo Ex. 13)	DEF000259- 000260	Improper, irrelevant, and probative value outweighed by risk of prejudice and confusion of claims. <i>See Fed. R. Evid. 401, 403.</i>		
702.		PVA Registered Vascular Technologist job description (Burnett Depo Ex.14)	DEF000261- 000263			
703.	05/25/2017	Verbal Warning (Burnett Depo Ex. 15)	DEF000305- 000306	Improper, irrelevant, and probative value outweighed by risk of prejudice and confusion of claims. <i>See Fed. R. Evid. 401, 403.</i>		

704.		PVA Leave of Absence Policies (Burnett Depo Ex. 16)	DEF000845- 000852	Improper, irrelevant, and probative value outweighed by risk of prejudice and confusion of claims. <i>See Fed. R. Evid. 401, 403.</i>		
705.	06/01/2017	Email from Carolyn Brensinger to Alicia Burnett (Burnett Depo Ex. 17)	DEF000202- 000204	Improper, irrelevant, and probative value outweighed by risk of prejudice and confusion of claims. <i>See Fed. R. Evid. 401, 403.</i>		
706.	07/07/2017	Email from Alicia Burnett to Carolyn Brensinger (Burnett Depo Ex. 18)	DEF000205	Improper, irrelevant, and probative value outweighed by risk of prejudice and confusion of claims. <i>See Fed. R. Evid. 401, 403.</i>		
707.	07/18/2017	Email from Alicia Burnett to Carolyn Brensinger (Burnett Depo Ex. 20)	DEF000207- 000209	Improper, irrelevant, and probative value outweighed by risk of prejudice and confusion of claims. <i>See Fed. R. Evid. 401, 403.</i>		
708.	07/18/2017	Email from Carolyn Brensinger to Barbara Burrow and Randi Balch (Burnett Depo Ex. 24)	DEF000219	Improper, irrelevant, and probative value outweighed by risk of prejudice and confusion of claims. <i>See Fed. R. Evid. 401, 403.</i>		
709.		Text messages (Burnett Depo Ex. 25)	DEF000321- 000322	Improper, irrelevant, hearsay, and probative value outweighed by risk of prejudice and confusion of claims. <i>See Fed. R. Evid. 401, 403, 801, 802.</i>		
710.	09/20/2017	Email from Alicia Gomez to Dru Jones (Burnett Depo Ex. 26)	DEF000309	Improper, irrelevant, and probative value outweighed by risk of prejudice and confusion of claims. <i>See Fed. R. Evid. 401, 403.</i>		
711.	07/10/2017	Notice of Eligibility and Rights & Responsibilities (Family and Medical Leave Act) (Burnett Depo Ex. 19)	DEF000210- 000211	Improper, irrelevant, and probative value outweighed by risk of prejudice and confusion of claims. <i>See Fed. R. Evid. 401, 403.</i>		
712.	07/11/2017	Certification of Health Care Provider for Family Member's Serious Health Condition (Family and Medical Leave Act) (Burnett Depo Ex. 21)	DEF000213- 000216	Improper, irrelevant, and probative value outweighed by risk of prejudice and confusion of claims. <i>See Fed. R. Evid. 401, 403.</i>		

713.	07/18/2017	Designation Notice (Family and Medical Leave Act) (Burnett Depo Ex. 22)	DEF000206	Improper, irrelevant, and probative value outweighed by risk of prejudice and confusion of claims. <i>See Fed. R. Evid. 401, 403.</i>		
714.	07/18/2017	PVA FMLA/ADA Approval Designation Acknowledgement Form (Burnett Depo Ex. 23)	DEF000212	Improper, irrelevant, and probative value outweighed by risk of prejudice and confusion of claims. <i>See Fed. R. Evid. 401, 403.</i>		
715.	09/20/2017	Email from Alicia Burnet regarding FMLA paperwork (Burnett Depo Ex. 27)	DEF000751- 000799	Improper, irrelevant, and probative value outweighed by risk of prejudice and confusion of claims. <i>See Fed. R. Evid. 401, 403.</i>		
716.		PVA patient confidential information (Burnett Depo Ex. 28)	BURNETT00000 1-000052	Improper, irrelevant, hearsay, and probative value outweighed by risk of prejudice; authentication/ foundation. <i>See Fed. R. Evid. 401, 403, 801, 802, 901.</i>		
717.		Text messages (Burnett Depo Ex. 31)	MARTINEZ0001 00-000103	Improper, irrelevant, hearsay, and probative value outweighed by risk of prejudice and confusion of claims. <i>See Fed. R. Evid. 401, 403, 801, 802.</i>		
718.	09/13/2019	Alicia Burnett's Responses to Defendant's First Set of Interrogatories (Burnett Depo Ex. 33)		Improper, irrelevant, and probative value outweighed by risk of prejudice and confusion of claims to the extent pertains to employment claims. <i>See Fed. R. Evid. 401, 403.</i>		
719.		Chart of patient 585950 (Burnett Depo Ex. 34, Ex. 35 and Moncrieff Depo Ex. 7)		Improper, irrelevant, hearsay, and probative value outweighed by risk of prejudice; authentication/ foundation. <i>See Fed. R. Evid. 401, 403, 801, 802, 901.</i>		
720.		Tiffany Moncrieff's Responses to Defendant's First Set of Interrogatories (Moncrieff Depo Ex. 5)		Improper, irrelevant, and probative value outweighed by risk of prejudice. <i>See Fed. R. Evid. 401, 403.</i>		

721.		Moncrieff's document production (Moncrieff Depo Ex. 6)	MONTCRIEFF0 00001-000739	Improper, irrelevant, and probative value outweighed by risk of prejudice and confusion of claims, duplicative as related to the designation of the entire production and violates best evidence rule. <i>See</i> Fed. R. Evid. 401, 403, 1003.		
722.		Robert D. Church document production PDF (Church Depo Ex. 1)	CHURCH000002-002204	Cumulative as related to the designation of the entire production and violates best evidence rule. <i>See</i> Fed. R. Evid. 1003. Improper, irrelevant, hearsay, and probative value outweighed by risk of prejudice; authentication/ foundation. <i>See</i> Fed. R. Evid. 401, 403, 801, 802, 901.		
723.		Defendant's Notice of Intention to Take Oral/Videotaped Deposition Duces Tecum of Robert D. Church, Jr. (Church Depo Ex. 3)				
724.		Seven Tips for Diagnostic Radiology Coding – AAPC Knowledge Center (Church Depo Ex. 6)				
725.		Section 6401 Affordable Care Act (Church Depo Ex. 7)				
726.		Defendant's Notice of Intention to Take Oral/Videotaped Deposition Duces Tecum of James E. Alexander, Jr. (Alexander Depo Ex. 1)				
727.		Exhibits to Expert Report of James E. Alexander, Jr., M.D. (Alexander Depo Ex. 5)				
728.	03/01/2017	Account Inquiry for Patient 580210 (Alexander Depo Ex. 6)				
729.	08/16/2017	Cerebrovascular Duplex Scan for Patient 580210 (Alexander Depo Ex. 7)				

730.		Defendant's Notice of Intention to Take Oral/Videotaped Deposition Duces Tecum of Zachary Nye, Ph.D. (Nye Depo Ex. 1)				
731.		Zachary Nye Retainer Letter, Invoices and Fees (Nye Depo Ex. 2)	NYE 00025-00051	Improper, irrelevant, and probative value outweighed by risk of prejudice and confusion. <i>See Fed. R. Evid. 401, 403, 1003</i>		
732.		Photographs of Peripheral Vascular Associates	DEF0272283-0272322	<p>a) Failure to previously produce and/or to supplement production. <i>See Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); see also Wolk v. Green, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</i></p> <p>b) Improper, irrelevant, authentication/foundation, hearsay. <i>See Fed. R. Evid. 401, 403, 801, 802, 901.</i></p>		
733.		2018 Medicare Part B Fee Schedule - Texas Locality 99	DEF0272323-0272668	<p>a) Failure to previously produce and/or to supplement production. <i>See Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); see also Wolk v. Green, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</i></p> <p>b) Improper, irrelevant, authentication/foundation, hearsay. <i>See Fed. R. Evid. 401, 403, 801, 802, 901.</i></p>		
734.		Medical Records of Patient 813970	DEF0272669-0272674	<p>a) Failure to previously produce and/or to supplement production. <i>See Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); see also Wolk v. Green, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</i></p>		

				b) Improper, irrelevant, authentication/foundation. <i>See Fed. R. Evid. 401, 403, 901.</i>		
735.		Medical Records of Patient 93809	DEF0272675-0272678	a) Failure to previously produce and/or to supplement production. <i>See Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); see also Wolk v. Green, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</i> b) Improper, irrelevant, authentication/foundation. <i>See Fed. R. Evid. 401, 403, 901.</i>		
736.		Medical Records of Patient 23693	DEF0272679-0272683	a) Failure to previously produce and/or to supplement production. <i>See Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); see also Wolk v. Green, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</i> b) Improper, irrelevant, authentication/foundation. <i>See Fed. R. Evid. 401, 403, 901.</i>		
737.		Medical Records of Patient 18749	DEF0272684-0272688	a) Failure to previously produce and/or to supplement production. <i>See Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); see also Wolk v. Green, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</i> b) Improper, irrelevant, authentication/foundation. <i>See Fed. R. Evid. 401, 403, 901.</i>		

738.		Medical Records of Patient 7697	DEF0272689-0272694	<p>a) Failure to previously produce and/or to supplement production. <i>See</i> Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); <i>see also Wolk v. Green</i>, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</p> <p>b) Improper, irrelevant, authentication/foundation. <i>See</i> Fed. R. Evid. 401, 403, 901.</p>		
739.		Medical Records of Patient 51121	DEF0272695-0272707	<p>a) Failure to previously produce and/or to supplement production. <i>See</i> Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); <i>see also Wolk v. Green</i>, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</p> <p>b) Improper, irrelevant, authentication/foundation. <i>See</i> Fed. R. Evid. 401, 403, 901.</p>		
740.		Medical Records of Patient 15533	DEF0272708-0272712	<p>a) Failure to previously produce and/or to supplement production. <i>See</i> Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); <i>see also Wolk v. Green</i>, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</p> <p>b) Improper, irrelevant, authentication/foundation. <i>See</i> Fed. R. Evid. 401, 403, 901.</p>		

741.		Medical Records of Patient 38578	DEF0272713-0272718	<p>a) Failure to previously produce and/or to supplement production. <i>See Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); see also Wolk v. Green, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</i></p> <p>b) Improper, irrelevant, authentication/foundation. <i>See Fed. R. Evid. 401, 403, 901.</i></p>		
742.		Medical Records of Patient 39851	DEF0272719-0272725	<p>a) Failure to previously produce and/or to supplement production. <i>See Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); see also Wolk v. Green, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</i></p> <p>b) Improper, irrelevant, authentication/foundation. <i>See Fed. R. Evid. 401, 403, 901.</i></p>		
743.		Medical Records of Patient 206130	DEF0272726-0272732	<p>a) Failure to previously produce and/or to supplement production. <i>See Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); see also Wolk v. Green, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</i></p> <p>b) Improper, irrelevant, authentication/foundation. <i>See Fed. R. Evid. 401, 403, 901.</i></p>		
744.		Medical Records of Patient 151970	DEF0272733-0272746	<p>a) Failure to previously produce and/or to supplement production. <i>See Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); see also Wolk v. Green, No. C06-5025</i></p>		

				BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008). b) Improper, irrelevant, authentication/foundation. <i>See Fed. R. Evid. 401, 403, 901.</i>		
745.		Medical Records of Patient 99813	DEF0272747-0272753	a) Failure to previously produce and/or to supplement production. <i>See Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); see also Wolk v. Green, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</i> b) Improper, irrelevant, authentication/foundation. <i>See Fed. R. Evid. 401, 403, 901.</i>		
746.		Medical Records of Patient 21765	DEF0272754-0272760	a) Failure to previously produce and/or to supplement production. <i>See Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); see also Wolk v. Green, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</i> b) Improper, irrelevant, authentication/foundation. <i>See Fed. R. Evid. 401, 403, 901.</i>		
747.		Medical Records of Patient 21881	DEF0272761-0272771	a) Failure to previously produce and/or to supplement production. <i>See Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); see also Wolk v. Green, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</i>		

				b) Improper, irrelevant, authentication/foundation. <i>See Fed. R. Evid. 401, 403, 901.</i>		
748.		Medical Records of Patient 343030	DEF0272772-0272782	a) Failure to previously produce and/or to supplement production. <i>See Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); see also Wolk v. Green, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</i> b) Improper, irrelevant, authentication/foundation. <i>See Fed. R. Evid. 401, 403, 901.</i>		
749.		Medical Records of Patient 141010	DEF0272783-0272788	a) Failure to previously produce and/or to supplement production. <i>See Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); see also Wolk v. Green, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</i> b) Improper, irrelevant, authentication/foundation. <i>See Fed. R. Evid. 401, 403, 901.</i>		
750.		Medical Records of Patient 849	DEF0272789-0272795	a) Failure to previously produce and/or to supplement production. <i>See Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); see also Wolk v. Green, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</i> b) Improper, irrelevant, authentication/foundation. <i>See Fed. R. Evid. 401, 403, 901.</i>		

751.		Medical Records of Patient 4930	DEF0272796-0272801	<p>a) Failure to previously produce and/or to supplement production. <i>See</i> Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); <i>see also Wolk v. Green</i>, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</p> <p>b) Improper, irrelevant, authentication/foundation. <i>See</i> Fed. R. Evid. 401, 403, 901.</p>		
752.		Medical Records of Patient 19049	DEF0272802-0272807	<p>a) Failure to previously produce and/or to supplement production. <i>See</i> Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); <i>see also Wolk v. Green</i>, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</p> <p>b) Improper, irrelevant, authentication/foundation. <i>See</i> Fed. R. Evid. 401, 403, 901.</p>		
753.		Medical Records of Patient 84672	DEF0272808-0272814	<p>a) Failure to previously produce and/or to supplement production. <i>See</i> Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); <i>see also Wolk v. Green</i>, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</p> <p>b) Improper, irrelevant, authentication/foundation. <i>See</i> Fed. R. Evid. 401, 403, 901.</p>		

754.		Medical Records of Patient 250340	DEF0272815-0272820	<p>a) Failure to previously produce and/or to supplement production. <i>See Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); see also Wolk v. Green, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</i></p> <p>b) Improper, irrelevant, authentication/foundation. <i>See Fed. R. Evid. 401, 403, 901.</i></p>		
755.		Medical Records of Patient 39922	DEF0272821-0272826	<p>a) Failure to previously produce and/or to supplement production. <i>See Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); see also Wolk v. Green, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</i></p> <p>b) Improper, irrelevant, authentication/foundation. <i>See Fed. R. Evid. 401, 403, 901.</i></p>		
756.		Medical Records of Patient 31964	DEF0272827-0272833	<p>a) Failure to previously produce and/or to supplement production. <i>See Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); see also Wolk v. Green, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</i></p> <p>b) Improper, irrelevant, authentication/foundation. <i>See Fed. R. Evid. 401, 403, 901.</i></p>		
757.		Medical Records of Patient 17318	DEF0272834-0272841	<p>a) Failure to previously produce and/or to supplement production. <i>See Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1);</i></p>		

				<p><i>see also Wolk v. Green</i>, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</p> <p>b) Improper, irrelevant, authentication/foundation. <i>See Fed. R. Evid. 401, 403, 901.</i></p>		
758.		Medical Records of Patient 1444	DEF0272842-0272851	<p>a) Failure to previously produce and/or to supplement production. <i>See Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); see also Wolk v. Green</i>, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</p> <p>b) Improper, irrelevant, authentication/foundation. <i>See Fed. R. Evid. 401, 403, 901.</i></p>		
759.		Medstreaming Portal View of Medical Records of Patients 1045480, 883870, 926360	DEF0272852-0272856	<p>a) Failure to previously produce and/or to supplement production. <i>See Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); see also Wolk v. Green</i>, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</p> <p>b) Improper, irrelevant, authentication/foundation. <i>See Fed. R. Evid. 401, 403, 901.</i></p>		
760.		Medical Records of Patient 82300	DEF0272857-0272864	<p>a) Failure to previously produce and/or to supplement production. <i>See Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); see also Wolk v. Green</i>, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</p>		

				b) Improper, irrelevant, authentication/foundation. <i>See Fed. R. Evid. 401, 403, 901.</i>		
761.		Medical Records of Patient 929470	DEF0272865-0272871	a) Failure to previously produce and/or to supplement production. <i>See Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); see also Wolk v. Green, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</i> b) Improper, irrelevant, authentication/foundation. <i>See Fed. R. Evid. 401, 403, 901.</i>		
762.	07/11/2017	ACR letter to Novitas	DEF0272872-0272876	a) Failure to previously produce and/or to supplement production. <i>See Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); see also Wolk v. Green, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</i> b) Improper, irrelevant, authentication/foundation. <i>See Fed. R. Evid. 401, 403, 901.</i>		
763.		Medicare Benefit Policy Manual Chapter 15 80.6.1 definitions of order and what must be signed	DEF0272877-0272879	a) Failure to previously produce and/or to supplement production. <i>See Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); see also Wolk v. Green, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</i> b) Authentication/ foundation. <i>See Fed. R. Evid. 901.</i>		

764.		Local Coverage Determination (LCD) Non-Invasive Cerebrovascular Arterial Studies (L35397)	DEF0272880-0272893			
765.		Physicians Fee Schedule Code & Search 93922 26	DEF0272894-0272895	<p>a) Failure to previously produce and/or to supplement production. <i>See</i> Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); <i>see also Wolk v. Green</i>, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</p> <p>b) Authentication/ foundation, hearsay. <i>See</i> Fed. R. Evid. 901, 801, 802.</p>		
766.		Physicians Fee Schedule Code and Search 93922 TC	DEF0272896-0272897	<p>a) Failure to previously produce and/or to supplement production. <i>See</i> Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); <i>see also Wolk v. Green</i>, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</p> <p>b) Authentication/ foundation, hearsay. <i>See</i> Fed. R. Evid. 901; 801, 802.</p>		
767.		Novitas - Medical Review Signature Requirements	DEF0272898-0272902	<p>a) Authentication/ foundation, hearsay. <i>See</i> Fed. R. Evid. 901; 801, 802.</p>		
768.		Medstreaming Screenshot – Exam Browser	DEF0272903	<p>a) Failure to previously produce and/or to supplement production. <i>See</i> Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); <i>see also Wolk v. Green</i>, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</p> <p>b) Authentication/ foundation. <i>See</i> Fed. R. Evid. 901.</p>		

769.		Medical Records of Patient 699490	BURNETT00019 4	Improper, irrelevant, authentication/foundation. <i>See Fed. R. Evid. 401, 403, 901.</i>		
770.		Medical Records of Patient 986280	BURNETT00024 9	Improper, irrelevant, authentication/foundation. <i>See Fed. R. Evid. 401, 403, 901.</i>		
771.	01/10/2017	Medical Records of Patient 162630	BURNETT00026 1-000268	Improper, irrelevant, authentication/foundation. <i>See Fed. R. Evid. 401, 403, 901.</i>		
772.	05/27/2016	DT Tech Meeting agenda with handwritten notes	BURNETT00032 7	Improper, irrelevant. <i>See Fed. R. Evid. 401, 403.</i>		
773.		Peripheral Vascular Associates Information Security and Confidentiality Agreement	BURNETT00033 1-000332	Improper, irrelevant, authentication/foundation. <i>See Fed. R. Evid. 401, 403, 901.</i>		
774.	09/07/2017	Bypass Worksheet	BURNETT00054 4	Improper, irrelevant, authentication/foundation. <i>See Fed. R. Evid. 401, 403, 901.</i>		
775.	09/02/2016	Employee Counseling Statements for Roberta Martinez	MARTINEZ0001 34-000137	Improper, irrelevant, authentication/foundation. <i>See Fed. R. Evid. 401, 403, 901.</i>		
776.		Medical Records of Patient 107998	MARTINEZ0002 77	Improper, irrelevant, authentication/foundation. <i>See Fed. R. Evid. 401, 403, 901.</i>		
777.		Medicare Claims Processing Manual Chapter 13 – Radiology Services and Other Diagnostic Procedures	MONTCREIFF0 00766-000844			
778.	12/29/2011	DHHS CMS Manual System Pub 100-02 Medicare Benefit Policy	MONTCREIFF0 00992-001002			

779.		Peripheral Vascular Associates Renal Artery Duplex Protocol	MONTCREIFF0 01888-001890			
780.		CPT 2020 Professional Edition				
781.		Increasing Your Bottom Line: Using Modifiers 26 and TC Correctly to Indicate Professional and Technical Components of a Service	DEF0272906-0272908	<p>a) Failure to previously produce and/or to supplement production. <i>See</i> Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); <i>see also Wolk v. Green</i>, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</p> <p>b) Authentication/ foundation. <i>See</i> Fed. R. Evid. 901.</p>		
782.		CM Charge Pass	DEF0272909-0272910	<p>a) Failure to previously produce and/or to supplement production. <i>See</i> Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); <i>see also Wolk v. Green</i>, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</p> <p>b) Improper, incomplete, irrelevant, authentication/ foundation. <i>See</i> Fed. R. Evid. 401, 403, 901.</p>		
783.		CM Chart	DEF0272911	<p>a) Failure to previously produce and/or to supplement production. <i>See</i> Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); <i>see also Wolk v. Green</i>, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</p> <p>b) Improper, incomplete, irrelevant, authentication/ foundation. <i>See</i> Fed. R. Evid. 401, 403, 901.</p>		

784.		IClaim	DEF0272912	<p>a) Failure to previously produce and/or to supplement production. <i>See</i> Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); <i>see also Wolk v. Green</i>, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</p> <p>b) Improper, incomplete, irrelevant, authentication/ foundation. <i>See</i> Fed. R. Evid. 401, 403, 901.</p>		
785.		IClaims Backup	DEF0272913	<p>a) Failure to previously produce and/or to supplement production. <i>See</i> Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); <i>see also Wolk v. Green</i>, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</p> <p>b) Improper, incomplete, irrelevant, authentication/ foundation. <i>See</i> Fed. R. Evid. 401, 403, 901.</p>		
786.		Medstreaming Dashboard	DEF0272914-0272916	<p>a) Failure to previously produce and/or to supplement production. <i>See</i> Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); <i>see also Wolk v. Green</i>, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</p> <p>b) Improper, incomplete, irrelevant, authentication/ foundation. <i>See</i> Fed. R. Evid. 401, 403, 901.</p>		

787.		Payerpath Clearinghouse	DEF0272917	<p>a) Failure to previously produce and/or to supplement production. <i>See Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); see also Wolk v. Green, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</i></p> <p>b) Improper, incomplete, irrelevant, authentication/ foundation. <i>See Fed. R. Evid. 401, 403, 901.</i></p>		
788.		Payerpath Home Page	DEF0272918	<p>a) Failure to previously produce and/or to supplement production. <i>See Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); see also Wolk v. Green, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</i></p> <p>b) Improper, incomplete, irrelevant, authentication/ foundation. <i>See Fed. R. Evid. 401, 403, 901</i></p>		
789.		Physician Portal Dashboard	DEF0272919-0272920	<p>a) Failure to previously produce and/or to supplement production. <i>See Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); see also Wolk v. Green, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</i></p> <p>b) Improper, incomplete, irrelevant, authentication/ foundation. <i>See Fed. R. Evid. 401, 403, 901.</i></p>		
790.		PM Charge Entry Screen	DEF0272921	<p>a) Failure to previously produce and/or to supplement production. <i>See Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1);</i></p>		

				<p><i>see also Wolk v. Green</i>, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</p> <p>b) Improper, incomplete, irrelevant, authentication/ foundation. <i>See Fed. R. Evid. 401, 403, 901.</i></p>		
791.		Testing results from machine	DEF0272922-0272924	<p>a) Failure to previously produce and/or to supplement production. <i>See Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); see also Wolk v. Green</i>, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</p> <p>b) Improper, incomplete, irrelevant, authentication/ foundation. <i>See Fed. R. Evid. 401, 403, 901.</i></p>		
792.		Screenshot of Tech_scribe work screen	DEF0272925	<p>a) Failure to previously produce and/or to supplement production. <i>See Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); see also Wolk v. Green</i>, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</p> <p>b) Improper, incomplete, irrelevant, authentication/ foundation. <i>See Fed. R. Evid. 401, 403, 901.</i></p>		
793.		Screenshot showing 3 placeholder studies	DEF0272926	<p>a) Failure to previously produce and/or to supplement production. <i>See Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); see also Wolk v. Green</i>, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</p>		

				b) Improper, incomplete, irrelevant, authentication/ foundation. <i>See Fed. R. Evid. 401, 403, 901.</i>		
794.		Tech view entering data	DEF0279227	<p>a) Failure to previously produce and/or to supplement production. <i>See Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); see also Wolk v. Green, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</i></p> <p>b) Improper, incomplete, irrelevant, authentication/ foundation. <i>See Fed. R. Evid. 401, 403, 901.</i></p>		
795.		Tech Worksheet	DEF0272928	<p>a) Failure to previously produce and/or to supplement production. <i>See Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); see also Wolk v. Green, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</i></p> <p>b) Improper, incomplete, irrelevant, authentication/ foundation. <i>See Fed. R. Evid. 401, 403, 901.</i></p>		
796.		Worksheet	DEF0272929	<p>a) Failure to previously produce and/or to supplement production. <i>See Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); see also Wolk v. Green, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</i></p> <p>b) Improper, irrelevant, authentication/ foundation. <i>See Fed. R. Evid. 401, 403,</i></p>		

				901.		
797.		Comprehensive Error Rate Testing, Centers for Medicare & Medicaid Services, available at: https://www.cms.gov/Research-Statistics-Data-and-Systems/Monitoring-Programs/Improper-Payment-Measurement-Programs/CERT		<p>a) Failure to previously produce and/or to supplement production. <i>See Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); see also Wolk v. Green, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</i></p> <p>b) Authentication/ foundation, hearsay. <i>See Fed. R. Evid. 901; 801, 802.</i></p> <p>c) Document indicates contents “effective” (August 11, 2020) after relevant time period relating to claims here; Improper, irrelevant, and probative value outweighed by risk of prejudice. <i>See Fed. R. Evid. 401, 403.</i></p>		
798.		What is Fraud and Abuse, Novitas Solutions, available at: https://www.novitas-solutions.com/webcenter/portal/MedicalJL/pagebyid?contentId=00008240		<p>a) Failure to previously produce and/or to supplement production. <i>See Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); see also Wolk v. Green, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</i></p> <p>b) Authentication/ foundation, hearsay. <i>See Fed. R. Evid. 901; 801, 802.</i></p>		
799.		Targeted Probe and Educate, Novitas Solutions, https://www.novitas-solutions.com/webcenter/portal/MedicalJL/pagebyid?contentId=00158901		<p>a) Failure to previously produce and/or to supplement production. <i>See Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); see also Wolk v. Green, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</i></p> <p>b) Authentication/ foundation, hearsay. <i>See Fed. R. Evid. 901; 801, 802.</i></p>		

800.		Demonstrative Exhibits to be provided before trial in accordance with the Scheduling Order		<p>a) Failure to previously produce and/or to supplement production to the extent new data is used. <i>See Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); see also Wolk v. Green, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</i></p> <p>b) Authentication/ foundation, hearsay. <i>See Fed. R. Evid. 901; 801, 802.</i></p>		
801.		Summary of claims data		<p>a) Failure to previously produce and/or to supplement production. <i>See Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); see also Wolk v. Green, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</i></p> <p>b) Authentication/ foundation, hearsay. <i>See Fed. R. Evid. 901; 801, 802.</i></p>		
802.		Summary of claims		<p>a) Failure to previously produce and/or to supplement production. <i>See Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); see also Wolk v. Green, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</i></p> <p>b) Authentication/ foundation, hearsay. <i>See Fed. R. Evid. 901; 801, 802.</i></p>		
803.		Documents used for rebuttal or impeachment that are not listed above		<p>a) Failure to previously produce and/or to supplement production. <i>See Fed. R. Civ. Proc. 26(e); Fed. R. Civ. Proc. 37(c)(1); see also Wolk v. Green, No. C06-5025 BZ, 2008 WL 298757, *3 (N.D. Cal. Feb. 1, 2008).</i></p>		

				b) Authentication/ foundation, hearsay. <i>See Fed. R. Evid. 901; 801, 802.</i>		
804.		Documents identified by Plaintiffs that are not listed above				